KANE
SCRAP IRON & METAL INC.
P.O. Box 923 • 184 E. Meadow Street • Chicopee, MA 01014
Tel. 413-594-5160 • Fax. 413-594-1939
Buyers of Ferrous and Nonferrous Metals

October 7, 2015

Nora J. Chorover
Law Office of Nora J. Chorover
11 Green Street
Boston, MA 02130

Certified Mail: ##########

Re: 60-Day Notice of Violations and Intent to File Suit Regarding Noncompliance with Federal Clean Water Act's Industrial Stormwater Discharge Requirements: 184 East Meadow Street, Chicopee, MA

Dear Attorney Chorover:

This letter is in response to Clean Water Action's correspondence dated August 21, 2015 to Robert E. Kane, Jr., President, of Kane Scrap Iron & Metal, Inc. ("Kane") regarding stormwater discharges from the Kane facility located at 184 East Meadow Street in Chicopee, Massachusetts. From the outset, Kane wants to emphasize that it is taking CWA's allegations very seriously. Kane believes, however, that any concerns raised by CWA will be addressed to CWA's satisfaction in this response. For purposes of simplicity, we have addressed our responses according to the headings and numbered paragraphs set forth in your letter.

KANE'S VIOLATIONS AND DATES OF VIOLATIONS

1. Failure to Comply with the Permit's Monitoring Requirements

CWA alleges that Kane failed to monitor its discharges in accordance with the specific provisions of Section 6 of the MSGP during certain quarters. By way of background, Kane submitted its Notice of Intent (NOI) under the US EPA NPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP) on September 13, 2011. Stormwater monitoring under the MSGP, therefore, did not begin until the following quarter (Oct-Dec 2011). CWA's claim alleges that stormwater monitoring was not performed during the Oct-Dec 2011 and Oct-Dec 2014 quarters. Kane disagrees with CWA's claim that monitoring of stormwater was not performed during these time periods. Monitoring of stormwater from Outfalls DA-001 and DA-002 at the Kane facility were, in fact, monitored on December 22, 2011 and December 16, 2014, respectively. Please refer to Attachment A which contains the December 22, 2011 and December 16, 2014 Laboratory Analytical Reports.

CWA also alleges that Kane failed to utilize an appropriate hardness value when monitoring for copper, lead and zinc. Our consultant, Environmental Compliance Services, Inc. (ECS), recently sampled the receiving waterbody for hardness. Validated sample results yielded a value of 44.7 milligrams per liter. Please refer to Attachment B which contains the September 10, 2015 Laboratory Analytical Report. The corresponding benchmark values for copper, lead and zinc have been selected and applied retroactively and going forward.

2. Failure to Comply with the Permit's Reporting Requirements

CWA alleges that Kane failed to submit quarterly benchmark monitoring reports to EPA during certain quarters. As stated previously, Kane submitted its NOI under the MSGP on September 13, 2011. Reporting under the MSGP did not begin until the following quarter (Oct-Dec 2011). It is our understanding that reports for the remaining periods in question were previously submitted to the EPA in January 2012 and January 2014, respectively. In response to your August 21, 2015 correspondence, we made an inquiry to the EPA regarding these reports. We were informed by EPA that they could not locate the reports, despite our contention that they were, in fact, filed. To ensure that EPA's records were current, we filed the reports again on October 1, 2015. Additionally, we also submitted all previous stormwater monitoring results to MassDEP on September 25, 2015. Please refer to Attachment C for cover letters (without attachments) and UPS receipts of these submittals to EPA and MassDEP.

CWA has also alleged that Kane failed to prepare and submit to EPA annual reports that include findings from its annual comprehensive site inspections and documentation of corrective actions. As stated previously, Kane submitted its NOI under the MSGP on September 13, 2011. As such, an Annual Report for 2010 was not submitted. Kane's NOI was submitted less than three months before the end of the September 29, 2010 - September 29, 2011 inspection period. Per Section 4.3.1 of the MSGP, no comprehensive site inspection was required to be performed. Accordingly, no Annual Report was required to be submitted for 2011.

The Annual Reports for 2012, 2013 and 2014 were submitted on September 27, 2012, October 9, 2013, and October 1, 2014, respectively. As you can see from these annual reports, Kane has prepared and submitted to EPA annual reports that include findings from its annual comprehensive site inspections and documentation of corrective actions. Kane has and continues to identify and implement control measures and corrective actions aimed at minimizing the pollutants in its stormwater discharge. These control measures and corrective actions are documented in Section D of the 2012, 2013 and 2014 Annual Reports which are provided in Attachment D of this letter.

3. Failure to Minimize Pollutants and Implement Corrective Actions

CWA alleges that Kane, by failing to monitor its stormwater discharges, could not have ensured that proper control measures are minimizing its pollutant discharges. As we have outlined above, Kane has, in fact, been monitoring its stormwater discharges. Accordingly, Kane disputes any contention by CWA that it has not implemented proper control measures to minimize its pollutant discharges.

To the contrary, Kane, as part of its Stormwater Pollution Prevention Plan, has adopted many of the best management practices set forth in Section 2.1.2 (Non-Numeric Technology-Based Effluent Limits) and Section 8.N.3 (Technology-Based Effluent Limits) of the MSGP. These best management practices include, but are not necessarily limited to, the following:

- Inbound scrap material control program via a List of Prohibited Scrap Materials that is provided to all customers;
- When/where feasible, materials and equipment are staged indoors or under cover and on concrete pads or surrounded by concrete barriers;
- Waste containers are covered unless being loaded or unloaded;
- All waste is handled/disposed in accordance with Federal and State regulations;
- All spent batteries are stored indoors and are properly recycled/disposed;
- No vehicle washing is conducted on site;
- Fork truck maintenance is conducted indoors;
- All containers of oil or hazardous substances are stored inside buildings and either equipped with secondary containment or stored in areas where the floor is in good condition and not equipped with floor drains and no building exits are located nearby;
- Spill/overflow protection equipment is used, as are fueling hoses with check valves;
- Spill response equipment is maintained on site and spills are immediately cleaned up;
- Equipment and material storage areas are inspected quarterly; and
- Employees are trained in these practices annually.

Moreover, Kane has and continues to identify and implement control measures and corrective actions aimed at minimizing the pollutants in its stormwater discharges. These are documented in Section D of the 2012, 2013 and 2014 Annual Reports which are provided as part of Attachment D to this letter. A synopsis of structural control measures employed to date, in addition to those listed above, is as follows:

2011:

- Sediment blockers installed in DA-001 and DA-002

2012:

- Bi-weekly manual sweeping within a thirty foot radius around DA-001 and DA-002

- Weekly sweeping of paved areas with a street sweeper
- Installation of asphalt curbing along non-paved areas

2013:

- Weekly sweeping of paved areas with a street sweeper
- Installation of silt fence/straw bale barriers around unpaved and production/storage areas

2014:

- Weekly sweeping of paved areas with a street sweeper
- Evaluation of catch basin filtration inserts for DA-001 and DA-002

2015:

- Weekly sweeping of paved areas with a street sweeper
- Purchase of CleanWay Storm Clean catch basin filtration inserts for DA-001 and DA-002 with installation following receipt of these custom-made devices (estimated year end 2015)

While Kane has not been able to achieve the applicable EPA benchmark levels for four consecutive quarters, the stormwater monitoring results have nonetheless been steadily decreasing. Please see the line graphs in Attachment E. As shown in the line graphs, there has been a downward trend in aluminum, copper, iron, zinc and chemical oxygen demand at both outfalls.

Additional technology and infrastructure investment using the CleanWay catch basin inserts is anticipated to result in further reductions in our regulated discharge parameters. These inserts have been ordered and paid for and are expected to be installed by the end of calendar year 2015. Please refer to the following links for further detailed information on this equipment:

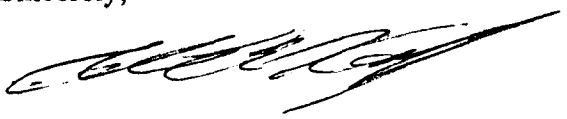
http://www.cleanwayusa.com/catch-basin-filtration-inserts.php
http://www.cleanwayusa.com/metals-removal-media.php.

CONCLUSION

Kane respectfully disagrees with CWA that its Notice of Violations and Intent to File Suit sufficiently states the basis for a civil action. As conclusively demonstrated herein, Kane has complied with its monitoring, reporting and implementation of corrective action requirements associated with the MSGP. Kane has demonstrated a commitment to compliance under the MSGP. Kane has established a continuous improvement system which has been and continues to be successful in reducing regulated discharge parameters. Given that Kane has been maintaining compliance with the MSGP, any alleged violations have been remedied and it is unlikely that any past alleged violations will recur, we believe litigation is not appropriate.

Kane trusts that this response meets the concerns of Clean Water Action regarding the alleged MSGP violations and demonstrates the company's record of compliance. Should you have any questions regarding this matter, please do not hesitate to contact me.

Sincerely,



Robert Kane
President

Attachments

cc: (by certified mail)

Curt Spalding, Regional Administrator
EPA New England, Region 1
5 Post Office Square, Ste. 100
Boston, MA 02109

Gina McCarthy, Administrator
US EPA Headquarters
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Eric Holder, Attorney General
US Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530-0001

Martin Suuberg, Commissioner
Massachusetts Department of Environmental Protection
One Winter Street
Boston, MA 02108

ATTACHMENT A

December 22, 2011 and December 16, 2014 Laboratory Analytical Reports

Report Date:
06-Jan-12 11:25

☑ Final Report
☐ Re-Issued Report
☐ Revised Report

SPECTRUM ANALYTICAL, INC.
Featuring
HANIBAL TECHNOLOGY

Laboratory Report

Environmental Compliance Services
588 Silver Street
Agawam, MA 01001
Attn: Todd Donze

Project: Kane Scrap Iron + Metal Inc - Chicopee, MA
Project #: 01-215-977.00.00

Laboratory ID	Client Sample ID	Matrix	Date Sampled	Date Received
SB41540-01	DA-001	Storm Water	22-Dec-11 00:00	22-Dec-11 15:10
SB41540-02	DA-002	Storm Water	22-Dec-11 00:00	22-Dec-11 15:10

I attest that the information contained within the report has been reviewed for accuracy and checked against the quality control requirements for each method. These results relate only to the sample(s) as received.
All applicable NELAC requirements have been met.

Massachusetts # M-MA138/MA1110
Connecticut # PH-0777
Florida # E87600/E87936
Maine # MA138
New Hampshire # 2538
New Jersey # MA011/MA012
New York # 11393/11840
Pennsylvania # 68-04426/68-02924
Rhode Island # 98
USDA # S-51435

Authorized by:

Nicole Leja
Laboratory Director

Spectrum Analytical holds certification in the State of Massachusetts for the analytes as indicated with an X in the "Cert." column within this report. Please note that the State of Massachusetts does not offer certification for all analytes.
Please note that this report contains 7 pages of analytical data plus Chain of Custody document(s). When the Laboratory Report is indicated as revised, this report supersedes any previously dated reports for the laboratory ID(s) referenced above. Where this report identifies subcontracted analyses, copies of the subcontractor's test report are available upon request. This report may not be reproduced, except in full, without written approval from Spectrum Analytical, Inc.

Spectrum Analytical, Inc. is a NELAC accredited laboratory organization and meets NELAC testing standards. Use of the NELAC logo however does not insure that Spectrum is currently accredited for the specific method or analyte indicated. Please refer to our "Quality" web page at www.spectrum-analytical.com for a full listing of our current certifications and fields of accreditation. States in which Spectrum Analytical, Inc. holds NELAC certification are New York, New Hampshire, New Jersey and Florida. All analytical work for Volatile Organic and Air analysis are transferred to and conducted at our 830 Silver Street location (NY-11840, FL-E87936 and NJ-MA012).

CASE NARRATIVE:

The samples were received 0.4 degrees Celsius, please refer to the Chain of Custody for details specific to temperature upon receipt. An infrared thermometer with a tolerance of +/- 2.0 degrees Celsius was used immediately upon receipt of the samples.

If a Matrix Spike (MS), Matrix Spike Duplicate (MSD) or Duplicate (DUP) was not requested on the Chain of Custody, method criteria may have been fulfilled with a source sample not of this Sample Delivery Group.

See below for any non-conformances and issues relating to quality control samples and/or sample analysis/matrix.

EPA 200.7

Blanks:

1127058-BLK1

The method blank contains analyte at a concentration above the MRL; however, concentration is less than 10% of the sample result, which is negligible according to method criteria.

Iron

Sample Identification	Client Project #	Matrix	Collection Date/Time	Received
DA-001 SB41540-01	01-215-977.00.00	Storm Water	22-Dec-11 00:00	22-Dec-11

CAS No.	Analyte(s)	Result	Flag	Units	*RDL	MDL	Dilution	Method Ref.	Prepared	Analyzed	Analyst	Batch	Cert.
Total Metals by EPA 200/6000 Series Methods													
	Preservation	Field Preserved		N/A			1	EPA 200/6000 methods	23-Dec-11	23-Dec-11	AMT	1126933	
Total Metals by EPA 200 Series Methods													
7429-90-5	Aluminum	4.99		mg/l	0.0250	0.0167	1	EPA 200.7	28-Dec-11	30-Dec-11	lr	1127058	X
7440-50-8	Copper	0.395		mg/l	0.0050	0.0024	1	"	"	03-Jan-12	"	"	X
7439-89-6	Iron	9.62		mg/l	0.0150	0.0098	1	"	"	30-Dec-11	"	"	X
7439-92-1	Lead	0.345		mg/l	0.0075	0.0028	1	"	"	"	"	"	X
7440-66-6	Zinc	0.414		mg/l	0.0050	0.0025	1	"	"	"	"	"	X
General Chemistry Parameters													
	Hardness	286		mg/l CaCO3	0.291	0.242	1	SM 2340B	28-Dec-11	30-Dec-11	lr	1127058	X
	Chemical Oxygen Demand	218		mg/l	20.0	6.50	1	HACH8000	29-Dec-11	29-Dec-11	GMA	1127277	X
	Total Suspended Solids	3,710		mg/l	50	31	1	SM2540D	28-Dec-11	29-Dec-11	BD	1127152	X

Sample Identification	Client Project #	Matrix	Collection Date/Time	Received
DA-002	01-215-977.00.00	Storm Water	22-Dec-11 00:00	22-Dec-11
SB41540-02				

CAS No.	Analyte(s)	Result	Flag	Units	*RDL	MDL	Dilution	Method Ref.	Prepared	Analyzed	Analyst	Batch	Cert.
Total Metals by EPA 200/6000 Series Methods													
	Preservation	Field Preserved		N/A			1	EPA 200/6000 methods	23-Dec-11	23-Dec-11	AMT	1126933	
Total Metals by EPA 200 Series Methods													
7429-90-5	Aluminum	15.6		mg/l	0.0250	0.0167	1	EPA 200.7	28-Dec-11	30-Dec-11	lr	1127058	X
7440-50-8	Copper	0.553		mg/l	0.0050	0.0024	1	"	"	03-Jan-12	"	"	X
7439-89-6	Iron	25.4		mg/l	0.0150	0.0098	1	"	"	30-Dec-11	"	"	X
7439-92-1	Lead	0.385		mg/l	0.0075	0.0028	1	"	"	"	"	"	X
7440-66-6	Zinc	0.792		mg/l	0.0050	0.0025	1	"	"	"	"	"	X
General Chemistry Parameters													
	Hardness	136		mg/l CaCO3	0.291	0.242	1	SM 2340B	28-Dec-11	30-Dec-11	lr	1127058	X
	Chemical Oxygen Demand	171		mg/l	20.0	6.50	1	HACH8000	29-Dec-11	29-Dec-11	GMA	1127277	X
	Total Suspended Solids	740		mg/l	50	31	1	SM2540D	28-Dec-11	29-Dec-11	BD	1127152	X

Total Metals by EPA 200 Series Methods - Quality Control

Analyte(s)	Result	Flag	Units	*RDL	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch 1127058 - EPA 200 Series										
Blank (1127058-BLK1)						Prepared: 28-Dec-11 Analyzed: 30-Dec-11				
Zinc	< 0.0050		mg/l	0.0050						
Lead	< 0.0075		mg/l	0.0075						
Iron	**0.0646**	QB1	mg/l	0.0150						
Aluminum	< 0.0250		mg/l	0.0250						
Copper	< 0.0050		mg/l	0.0050						
LCS (1127058-BS1)						Prepared: 28-Dec-11 Analyzed: 30-Dec-11				
Lead	**1.37**		mg/l	0.0075	1.25		109	85-115		
Iron	**1.40**		mg/l	0.0150	1.25		112	85-115		
Zinc	**1.32**		mg/l	0.0050	1.25		106	85-115		
Aluminum	**1.39**		mg/l	0.0250	1.25		111	85-115		
Copper	**1.37**		mg/l	0.0050	1.25		110	85-115		

General Chemistry Parameters - Quality Control

Analyte(s)	Result	Flag	Units	*RDL	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch 1127058 - EPA 200 Series										
Blank (1127058-BLK1)						Prepared: 28-Dec-11 Analyzed: 30-Dec-11				
Hardness	< 0.291		mg/l CaCO3	0.291						
LCS (1127058-BS1)						Prepared: 28-Dec-11 Analyzed: 30-Dec-11				
Hardness	**23.0**		mg/l CaCO3	0.291	20.8		111	85-115		
Batch 1127152 - General Preparation										
Blank (1127152-BLK1)						Prepared: 28-Dec-11 Analyzed: 29-Dec-11				
Total Suspended Solids	< 5		mg/l	5						
LCS (1127152-BS1)						Prepared: 28-Dec-11 Analyzed: 29-Dec-11				
Total Suspended Solids	**86**		mg/l	10	89.0		97	90-110		
Batch 1127277 - General Preparation										
Blank (1127277-BLK1)						Prepared & Analyzed: 29-Dec-11				
Chemical Oxygen Demand	< 5.00		mg/l	5.00						
LCS (1127277-BS1)						Prepared & Analyzed: 29-Dec-11				
Chemical Oxygen Demand	**49.3**		mg/l	5.00	50.0		99	90-110		
Calibration Blank (1127277-CCB1)						Prepared & Analyzed: 29-Dec-11				
Chemical Oxygen Demand	**0.125**		mg/l							
Calibration Blank (1127277-CCB2)						Prepared & Analyzed: 29-Dec-11				
Chemical Oxygen Demand	**1.14**		mg/l							
Calibration Blank (1127277-CCB3)						Prepared & Analyzed: 29-Dec-11				
Chemical Oxygen Demand	**0.276**		mg/l							
Calibration Check (1127277-CCV1)						Prepared & Analyzed: 29-Dec-11				
Chemical Oxygen Demand	**49.1**		mg/l		50.0		98	90-110		
Calibration Check (1127277-CCV2)						Prepared & Analyzed: 29-Dec-11				
Chemical Oxygen Demand	**48.0**		mg/l		50.0		96	90-110		
Calibration Check (1127277-CCV3)						Prepared & Analyzed: 29-Dec-11				
Chemical Oxygen Demand	**48.7**		mg/l		50.0		97	90-110		
Reference (1127277-SRM1)						Prepared & Analyzed: 29-Dec-11				
Chemical Oxygen Demand	**74.5**		mg/l	5.00	77.5		96	79-115		

Notes and Definitions

QB1	The method blank contains analyte at a concentration above the MRL; however, concentration is less than 10% of the sample result, which is negligible according to method criteria.
dry	Sample results reported on a dry weight basis
NR	Not Reported
RPD	Relative Percent Difference

Laboratory Control Sample (LCS): A known matrix spiked with compound(s) representative of the target analytes, which is used to document laboratory performance.

Matrix Duplicate: An intra-laboratory split sample which is used to document the precision of a method in a given sample matrix.

Matrix Spike: An aliquot of a sample spiked with a known concentration of target analyte(s). The spiking occurs prior to sample preparation and analysis. A matrix spike is used to document the bias of a method in a given sample matrix.

Method Blank: An analyte-free matrix to which all reagents are added in the same volumes or proportions as used in sample processing. The method blank should be carried through the complete sample preparation and analytical procedure. The method blank is used to document contamination resulting from the analytical process.

Method Detection Limit (MDL): The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is greater than zero and is determined from analysis of a sample in a given matrix type containing the analyte.

Reportable Detection Limit (RDL): The lowest concentration that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions. For many analytes the RDL analyte concentration is selected as the lowest non-zero standard in the calibration curve. While the RDL is approximately 5 to 10 times the MDL, the RDL for each sample takes into account the sample volume/weight, extract/digestate volume, cleanup procedures and, if applicable, dry weight correction. Sample RDLs are highly matrix-dependent.

Surrogate: An organic compound which is similar to the target analyte(s) in chemical composition and behavior in the analytical process, but which is not normally found in environmental samples. These compounds are spiked into all blanks, standards, and samples prior to analysis. Percent recoveries are calculated for each surrogate.

Continuing Calibration Verification: The calibration relationship established during the initial calibration must be verified at periodic intervals. Concentrations, intervals, and criteria are method specific.

Validated by:
Nicole Leja

SB41540 ch

SPECTRUM ANALYTICAL, INC.
Featuring
HANIBAL TECHNOLOGY

CHAIN OF CUSTODY RECORD

Page 1 of 1

Special Handling:
- ☐ Standard TAT - 7 to 10 business days
- ☐ Rush TAT - Date Needed: ________
- All TATs subject to laboratory approval.
- Min. 24-hour notification needed for rushes.
- Samples disposed of after 60 days unless otherwise instructed.

Report To: Todd Donze, ECS - Agawam

Telephone #: (413) 789-3530

Project Mgr.: Todd Donze

Invoice To: Same

P.O. No.: ______ RQN: ______

Project No.: 01-215-977.0000

Site Name: Kane Scrap Iron + Metal, Inc

Location: Chicopee State: MA

Sampler(s): R. Kane

1=$Na_2S_2O_3$ 2=HCl 3=H_2SO_4 4=HNO_3 5=NaOH 6=Ascorbic Acid 7=CH_3OH
8=$NaHSO_4$ 9=Deionized Water 10=______ 11=______

DW=Drinking Water GW=Groundwater WW=Wastewater
O=Oil SW=Surface Water SO=Soil SL=Sludge A=Air
X1= Storm Water X2=______ X3=______

G=Grab C=Composite

List preservative code below:

Lab Id:	Sample Id:	Date:	Time:	Type	Matrix	# of VOA Vials	# of Amber Glass	# of Clear Glass	# of Plastic	COD	~~TSS~~ TSS	Total Al, Cu, Fe, Pb, Zn	Hardness
SB41540.01	DA-001	12/22/11		G	X1				3	X	X	X	X
↓ .02	DA-002	12/22/11		G	X1				3	X	X	X	X

QA/QC Reporting Notes:
* additional charges may apply

MA DEP MCP CAM Report: Yes ☐ No ☐
CT DPH RCP Report: Yes ☐ No ☐

QA/QC Reporting Level
☐ Standard ☐ No QC ☐ DQA*
☐ NY ASP A* ☐ NY ASP B*
☐ NJ Reduced* ☐ NJ Full*
☐ TIER II* ☐ TIER IV*
☐ Other ______

State-specific reporting standards: R. C. Clwd. Ex.

Relinquished by:	Received by:	Date:	Time:	Temp°C
[signature]	T. Bender	12/22/11	9:15	—
T. Bender	[signature]	12/22/11	1511	0.4

☐ EDD Format
☑ E-mail to E-mail to TDonze@ECSConsult.com

☒ Ambient ☐ Iced ☒ Refrigerated ☐ Fridge temp ___°C ☐ Freezer temp ___°C

Report Date:
05-Jan-15 13:57

☑ Final Report
☐ Re-Issued Report
☐ Revised Report

SPECTRUM ANALYTICAL, INC.
Featuring
HANIBAL TECHNOLOGY

Laboratory Report

Environmental Compliance Services
588 Silver Street
Agawam, MA 01001
Attn: Todd Donze

Project: Kane Scrap Iron + Metal Inc - Chicopee, MA
Project #: 01-215977:13.00

Laboratory ID	Client Sample ID	Matrix	Date Sampled	Date Received
SC01481-01	DA-001	Storm Water	16-Dec-14 23:00	18-Dec-14 14:33
SC01481-02	DA-002	Storm Water	16-Dec-14 23:00	18-Dec-14 14:33

I attest that the information contained within the report has been reviewed for accuracy and checked against the quality control requirements for each method. These results relate only to the sample(s) as received.
All applicable NELAC requirements have been met.

Massachusetts # M-MA138/MA1110
Connecticut # PH-0777
Florida # E87600/E87936
Maine # MA138
New Hampshire # 2538
New Jersey # MA011/MA012
New York # 11393/11840
Pennsylvania # 68-04426/68-02924
Rhode Island # 98
USDA # S-51435

Authorized by:

Nicole Leja
Laboratory Director

Spectrum Analytical holds certification in the State of Massachusetts for the analytes as indicated with an X in the "Cert." column within this report. Please note that the State of Massachusetts does not offer certification for all analytes. Please refer to our website for specific certification holdings in each state.
Please note that this report contains 7 pages of analytical data plus Chain of Custody document(s). When the Laboratory Report is indicated as revised, this report supersedes any previously dated reports for the laboratory ID(s) referenced above. Where this report identifies subcontracted analyses, copies of the subcontractor's test report are available upon request. This report may not be reproduced, except in full, without written approval from Spectrum Analytical, Inc.

Spectrum Analytical, Inc. is a NELAC accredited laboratory organization and meets NELAC testing standards. Use of the NELAC logo however does not insure that Spectrum is currently accredited for the specific method or analyte indicated. Please refer to our "Quality" web page at www.spectrum-analytical.com for a full listing of our current certifications and fields of accreditation. States in which Spectrum Analytical, Inc. holds NELAC certification are New York, New Hampshire, New Jersey, Pennsylvania and Florida. All analytical work for Volatile Organic and Air analysis are transferred to and conducted at our 830 Silver Street location (NY-11840, NJ-MA012, PA-68-04426 and FL-E87936).

Please contact the Laboratory or Technical Director at 800-789-9115 with any questions regarding the data contained in this laboratory report.

CASE NARRATIVE:

Data has been reported to the RDL. This report excludes estimated concentrations detected below the RDL and above the MDL (J-Flag).

All non-detects and all results below the reporting limit are reported as "<" (less than) the reporting limit in this report.

The samples were received 1.6 degrees Celsius, please refer to the Chain of Custody for details specific to temperature upon receipt. An infrared thermometer with a tolerance of +/- 1.0 degrees Celsius was used immediately upon receipt of the samples.

If a Matrix Spike (MS), Matrix Spike Duplicate (MSD) or Duplicate (DUP) was not requested on the Chain of Custody, method criteria may have been fulfilled with a source sample not of this Sample Delivery Group.

Analyses for Total Hardness, pH, and Total Residual Chlorine fall under the state of Pennsylvania code Chapter 252.6 accreditation by rule.

See below for any non-conformances and issues relating to quality control samples and/or sample analysis/matrix.

HACH8000

Samples:

SC01481-01 *DA-001*

Sample dilution required for high concentration of target analytes to be within the instrument calibration range.

Chemical Oxygen Demand

SC01481-02 *DA-002*

Sample dilution required for high concentration of target analytes to be within the instrument calibration range.

Chemical Oxygen Demand

Sample Acceptance Check Form

Client:	Environmental Compliance Services - Agawam, MA
Project:	Kane Scrap Iron + Metal Inc - Chicopee, MA / 01-215977:13.00
Work Order:	SC01481
Sample(s) received on:	12/18/2014

The following outlines the condition of samples for the attached Chain of Custody upon receipt.

	Yes	No	N/A
Were custody seals present?	☐	☑	☐
Were custody seals intact?	☐	☐	☑
Were samples received at a temperature of ≤ 6°C?	☑	☐	☐
Were samples refrigerated upon transfer to laboratory representative?	☑	☐	☐
Were sample containers received intact?	☑	☐	☐
Were samples properly labeled (labels affixed to sample containers and include sample ID, site location, and/or project number and the collection date)?	☑	☐	☐
Were samples accompanied by a Chain of Custody document?	☑	☐	☐
Does Chain of Custody document include proper, full, and complete documentation, which shall include sample ID, site location, and/or project number, date and time of collection, collector's name, preservation type, sample matrix and any special remarks concerning the sample?	☐	☑	☐
Did sample container labels agree with Chain of Custody document?	☑	☐	☐
Were samples received within method-specific holding times?	☑	☐	☐

Sample Identification	Client Project #	Matrix	Collection Date/Time	Received
DA-001 SC01481-01	01-215977:13.00	Storm Water	16-Dec-14 23:00	18-Dec-14

CAS No.	Analyte(s)	Result	Flag	Units	*RDL	MDL	Dilution	Method Ref.	Prepared	Analyzed	Analyst	Batch	Cert.
Total Metals by EPA 200/6000 Series Methods													
	Preservation	**Field Preserved**		N/A			1	EPA 200/6000 methods			JRA	1429930	
Total Metals by EPA 200 Series Methods													
7429-90-5	Aluminum	**1.31**		mg/l	0.0500	0.0171	1	EPA 200.7	29-Dec-14	02-Jan-15	edt	1430217	X
7440-70-2	Calcium	**59.9**		mg/l	0.200	0.128	1	"	"	31-Dec-14	"	"	X
7440-50-8	Copper	**0.134**		mg/l	0.0100	0.0036	1	"	"	"	"	"	X
7439-89-6	Iron	**2.73**		mg/l	0.0300	0.0180	1	"	"	05-Jan-15	"	"	X
7439-95-4	Magnesium	**4.62**		mg/l	0.0200	0.0075	1	"	"	02-Jan-15	"	"	X
7440-66-6	Zinc	**0.253**		mg/l	0.0100	0.0066	1	"	"	31-Dec-14	"	"	X
General Chemistry Parameters													
	Hardness	**169**	HD	mg/l CaCO3	0.582	0.351	1	SM 2340B	29-Dec-14	02-Jan-15	edt	[CALC]	
	Chemical Oxygen Demand	**407**	GS1,LIV	mg/l	50.0	16.7	1	HACH8000	23-Dec-14	23-Dec-14	CAA/T	1430056	X

Sample Identification	Client Project #	Matrix	Collection Date/Time	Received
DA-002 SC01481-02	01-215977:13.00	Storm Water	16-Dec-14 23:00	18-Dec-14

CAS No.	Analyte(s)	Result	Flag	Units	*RDL	MDL	Dilution	Method Ref.	Prepared	Analyzed	Analyst	Batch	Cert.
Total Metals by EPA 200/6000 Series Methods													
	Preservation	**Field Preserved**		N/A			1	EPA 200/6000 methods			JRA	1429930	
Total Metals by EPA 200 Series Methods													
7429-90-5	Aluminum	**0.944**		mg/l	0.0500	0.0171	1	EPA 200.7	29-Dec-14	02-Jan-15	edt	1430217	X
7440-70-2	Calcium	**51.6**		mg/l	0.200	0.128	1	"	"	31-Dec-14	"	"	X
7440-50-8	Copper	**0.0939**		mg/l	0.0100	0.0036	1	"	"	"	"	"	X
7439-89-6	Iron	**1.89**		mg/l	0.0300	0.0180	1	"	"	05-Jan-15	"	"	X
7439-95-4	Magnesium	**4.10**		mg/l	0.0200	0.0075	1	"	"	02-Jan-15	"	"	X
7440-66-6	Zinc	**0.133**		mg/l	0.0100	0.0066	1	"	"	31-Dec-14	"	"	X
General Chemistry Parameters													
	Hardness	**146**	HD	mg/l CaCO3	0.582	0.351	1	SM 2340B	29-Dec-14	02-Jan-15	edt	[CALC]	
	Chemical Oxygen Demand	**236**	GS1,LIV	mg/l	10.0	3.34	1	HACH8000	23-Dec-14	23-Dec-14	CAA/T	1430056	X

Total Metals by EPA 200 Series Methods - Quality Control

Analyte(s)	Result	Flag	Units	*RDL	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch 1430217 - EPA 200 Series										
Blank (1430217-BLK1)					Prepared: 29-Dec-14 Analyzed: 02-Jan-15					
Magnesium	< 0.0200		mg/l	0.0200						
Iron	< 0.0300		mg/l	0.0300						
Zinc	< 0.0100		mg/l	0.0100						
Aluminum	< 0.0500		mg/l	0.0500						
Calcium	< 0.200		mg/l	0.200						
Copper	< 0.0100		mg/l	0.0100						
LCS (1430217-BS1)					Prepared: 29-Dec-14 Analyzed: 31-Dec-14					
Zinc	**2.49**		mg/l	0.0100	2.50		100	85-115		
Magnesium	**2.51**		mg/l	0.0200	2.50		100	85-115		
Iron	**2.62**		mg/l	0.0300	2.50		105	85-115		
Aluminum	**2.66**		mg/l	0.0500	2.50		106	85-115		
Calcium	**12.0**		mg/l	0.200	12.5		96	85-115		
Copper	**2.56**		mg/l	0.0100	2.50		102	85-115		

General Chemistry Parameters - Quality Control

Analyte(s)	Result	Flag	Units	*RDL	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch 1430056 - General Preparation										
Blank (1430056-BLK1)						Prepared & Analyzed: 23-Dec-14				
Chemical Oxygen Demand	< 5.00		mg/l	5.00						
LCS (1430056-BS1)						Prepared & Analyzed: 23-Dec-14				
Chemical Oxygen Demand	46.5		mg/l	5.00	50.0		93	90-110		
Calibration Blank (1430056-CCB1)						Prepared & Analyzed: 23-Dec-14				
Chemical Oxygen Demand	-1.01		mg/l							
Calibration Blank (1430056-CCB2)						Prepared & Analyzed: 23-Dec-14				
Chemical Oxygen Demand	2.17		mg/l							
Calibration Blank (1430056-CCB3)						Prepared & Analyzed: 23-Dec-14				
Chemical Oxygen Demand	-1.40		mg/l							
Calibration Check (1430056-CCV1)						Prepared & Analyzed: 23-Dec-14				
Chemical Oxygen Demand	47.9		mg/l	5.00	50.0		96	90-110		
Calibration Check (1430056-CCV2)						Prepared & Analyzed: 23-Dec-14				
Chemical Oxygen Demand	47.0		mg/l	5.00	50.0		94	90-110		
Calibration Check (1430056-CCV3)						Prepared & Analyzed: 23-Dec-14				
Chemical Oxygen Demand	46.8		mg/l	5.00	50.0		94	90-110		
Duplicate (1430056-DUP1)			Source: SC01481-02			Prepared & Analyzed: 23-Dec-14				
Chemical Oxygen Demand	237		mg/l	10.0		236			0.1	20
Matrix Spike (1430056-MS1)			Source: SC01481-02			Prepared & Analyzed: 23-Dec-14				
Chemical Oxygen Demand	334		mg/l	10.0	100	236	98	80-120		
Matrix Spike Dup (1430056-MSD1)			Source: SC01481-02			Prepared & Analyzed: 23-Dec-14				
Chemical Oxygen Demand	331		mg/l	10.0	100	236	95	80-120	0.9	20
Reference (1430056-SRM1)						Prepared & Analyzed: 23-Dec-14				
Chemical Oxygen Demand	47.3		mg/l	5.00	50.0		95	79-117		

Notes and Definitions

GS1	Sample dilution required for high concentration of target analytes to be within the instrument calibration range.
dry	Sample results reported on a dry weight basis
NR	Not Reported
RPD	Relative Percent Difference
LIV	The initial volume for this sample has been reduced due to sample matrix and/or historical data therefore elevating the reporting limit.
HD	Total Hardness is a calculation based on the reported values of Ca and Mg.

Laboratory Control Sample (LCS): A known matrix spiked with compound(s) representative of the target analytes, which is used to document laboratory performance.

Matrix Duplicate: An intra-laboratory split sample which is used to document the precision of a method in a given sample matrix.

Matrix Spike: An aliquot of a sample spiked with a known concentration of target analyte(s). The spiking occurs prior to sample preparation and analysis. A matrix spike is used to document the bias of a method in a given sample matrix.

Method Blank: An analyte-free matrix to which all reagents are added in the same volumes or proportions as used in sample processing. The method blank should be carried through the complete sample preparation and analytical procedure. The method blank is used to document contamination resulting from the analytical process.

Method Detection Limit (MDL): The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is greater than zero and is determined from analysis of a sample in a given matrix type containing the analyte.

Reportable Detection Limit (RDL): The lowest concentration that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions. For many analytes the RDL analyte concentration is selected as the lowest non-zero standard in the calibration curve. While the RDL is approximately 5 to 10 times the MDL, the RDL for each sample takes into account the sample volume/weight, extract/digestate volume, cleanup procedures and, if applicable, dry weight correction. Sample RDLs are highly matrix-dependent.

Surrogate: An organic compound which is similar to the target analyte(s) in chemical composition and behavior in the analytical process, but which is not normally found in environmental samples. These compounds are spiked into all blanks, standards, and samples prior to analysis. Percent recoveries are calculated for each surrogate.

Continuing Calibration Verification: The calibration relationship established during the initial calibration must be verified at periodic intervals. Concentrations, intervals, and criteria are method specific.

Validated by:
June O'Connor
Nicole Leja

SC01489 SUB

SPECTRUM ANALYTICAL, INC.
Powering
HANNIBAL TECHNOLOGY

CHAIN OF CUSTODY RECORD

Page 1 of 1

Special Handling:
- [x] Standard TAT - 7 to 10 business days
- [ ] Rush TAT - Date Needed: _____

All TATs subject to laboratory approval
Min. 24-hr notification needed for rushes
Samples disposed after 60 days unless otherwise instructed

Report To: Todd Donze
ECS Agawam

Telephone #: (413) 789-3520
Project Mgr: Todd Donze

Invoice To: SAME

P.O No.: _____ Quote/RQN: 0001

Project No: 01-2599713.00

Site Name: Kane Scrap Iron + Metal, Inc

Location: Charlemont State: MA

Sampler(s): _____

F=Field Filtered 1=$Na_2S_2O_3$ 2=HCl 3=H_2SO_4 4=HNO_3 5=NaOH 6=Ascorbic Acid
7=CH3OH 8=$NaHSO_4$ 9=Deionized Water 10=H_3PO_4 11= Ice 12= _____

List Preservative Code below: 3* 4,11 4,11

QA/QC Reporting Notes:
*additional charges may apply

BW=Drinking Water GW=Groundwater SW=Surface Water WW=Waste Water
O=Oil SO=Soil SL=Sludge A=Indoor/Ambient Air SG=Soil Gas

X1= Stormwater X2= _____ X3= _____

G= Grab C=Composite

Lab ID:	Sample ID:	Date:	Time:	Type	Matrix	Containers: # of VOA Vials	# of Amber Glass	# of Clear Glass	# of Plastic	Analysis: COD	Total Al, Cu, Fe, Zn	Hardness	Check if chlorinated
SC01489-01	DA-001	12/16/14	11:00P	G	X1				2	X	X	X	☐
02	DA-002	12/16/14	11:00P	G	X1				2	X	X	X	☐
													☐
													☐
													☐
													☐
													☐
													☐
													☐
													☐

MA DEP MCP CAM Report? ☐ Yes ☑ No
CT DPH RCP Report? ☐ Yes ☑ No
☑ Standard ☐ No QC ☐ QC/A*
☐ RSP A* ☐ RSP B*
☐ GW Protection* ☐ S1 GW-1*
☐ Tier II* ☐ Tier IV*
☐ Other: _____
State specific reporting standards:

Relinquished by:	Received by:	Date:	Time:	Temp °C
		12-16-14	1227	Observed 1.6
		12/18/14	1433	Correction Factor 0
				Corrected 1.6
				TR ID # 01

☐ EDD format: _____
☑ E-mail to: Todd Donze
TDonze@ecsconsult.com

Condition upon receipt: Custody Seals: ☐ Present ☐ Intact ☐ Broken
☐ Ambient ☐ Iced ☑ Refrigerated ☐ DI VOA Frozen ☐ Soil Jar Frozen

ATTACHMENT B

September 10, 2015 Laboratory Analytical Report

eurofins | Spectrum Analytical

☑ Final Report
☐ Re-Issued Report
☐ Revised Report

Report Date:
22-Sep-15 12:45

Laboratory Report

Environmental Compliance Services
588 Silver Street
Agawam, MA 01001
Attn: Todd Donze

Project: Kane Scrap Iron + Metal Inc - Chicopee, MA
Project #: 01-215977.15.00

Laboratory ID	Client Sample ID	Matrix	Date Sampled	Date Received
SC12297-01	Hardness	Surface Water	10-Sep-15 11:00	10-Sep-15 11:30

I attest that the information contained within the report has been reviewed for accuracy and checked against the quality control requirements for each method. These results relate only to the sample(s) as received.
All applicable NELAC requirements have been met.

Massachusetts # M-MA138/MA1110
Connecticut # PH-0777
Florida # E87936
Maine # MA138
New Hampshire # 2538
New Jersey # MA011
New York # 11393
Pennsylvania # 68-04426/68-02924
Rhode Island # LAO00098
USDA # S-51435

Authorized by:

Nicole Leja
Laboratory Director

Eurofins Spectrum Analytical holds certification in the State of Massachusetts for the analytes as indicated with an X in the "Cert." column within this report. Please note that the State of Massachusetts does not offer certification for all analytes. Please refer to our website for specific certification holdings in each state.
Please note that this report contains 7 pages of analytical data plus Chain of Custody document(s). When the Laboratory Report is indicated as revised, this report supersedes any previously dated reports for the laboratory ID(s) referenced above. Where this report identifies subcontracted analyses, copies of the subcontractor's test report are available upon request. This report may not be reproduced, except in full, without written approval from Eurofins Spectrum Analytical, Inc.

Eurofins Spectrum Analytical, Inc. is a NELAC accredited laboratory organization and meets NELAC testing standards. Use of the NELAC logo however does not insure that Spectrum is currently accredited for the specific method or analyte indicated. Please refer to our Quality'web page at www.spectrum-analytical.com for a full listing of our current certifications and fields of accreditation. States in which Spectrum Analytical, Inc. holds NELAC certification are New York, New Hampshire, New Jersey, Pennsylvania and Florida. All analytical work for Volatile Organic and Air analysis are transferred to and conducted at our 830 Silver Street location (PA-68-04426).

Please contact the Laboratory or Technical Director at 800-789-9115 with any questions regarding the data contained in this laboratory report.

CASE NARRATIVE:

Data has been reported to the RDL. This report excludes estimated concentrations detected below the RDL and above the MDL (J-Flag).

All non-detects and all results below the reporting limit are reported as "<" (less than) the reporting limit in this report.

The samples were received 0.0 degrees Celsius, please refer to the Chain of Custody for details specific to temperature upon receipt. An infrared thermometer with a tolerance of +/- 1.0 degrees Celsius was used immediately upon receipt of the samples.

If a Matrix Spike (MS), Matrix Spike Duplicate (MSD) or Duplicate (DUP) was not requested on the Chain of Custody, method criteria may have been fulfilled with a source sample not of this Sample Delivery Group.

Analyses for Total Hardness, pH, and Total Residual Chlorine fall under the state of Pennsylvania code Chapter 252.6 accreditation by rule.

There is no relevant protocol-specific QC and/or performance standards non-conformances to report.

Sample Acceptance Check Form

Client:	Environmental Compliance Services - Agawam, MA
Project:	Kane Scrap Iron + Metal Inc - Chicopee, MA / 01-215977.15.00
Work Order:	SC12297
Sample(s) received on:	9/10/2015

The following outlines the condition of samples for the attached Chain of Custody upon receipt.

	Yes	No	N/A
Were custody seals present?	☐	☑	☐
Were custody seals intact?	☐	☐	☑
Were samples received at a temperature of ≤ 6°C?	☑	☐	☐
Were samples cooled on ice upon transfer to laboratory representative?	☑	☐	☐
Were sample containers received intact?	☑	☐	☐
Were samples properly labeled (labels affixed to sample containers and include sample ID, site location, and/or project number and the collection date)?	☑	☐	☐
Were samples accompanied by a Chain of Custody document?	☑	☐	☐
Does Chain of Custody document include proper, full, and complete documentation, which shall include sample ID, site location, and/or project number, date and time of collection, collector's name, preservation type, sample matrix and any special remarks concerning the sample?	☑	☐	☐
Did sample container labels agree with Chain of Custody document?	☑	☐	☐
Were samples received within method-specific holding times?	☑	☐	☐

Summary of Hits

Lab ID: SC12297-01 **Client ID:** Hardness

Parameter	Result	Flag	Reporting Limit	Units	Analytical Method
Calcium	14.8		0.100	mg/l	EPA 200.7
Magnesium	1.91		0.0100	mg/l	EPA 200.7
Hardness	44.7		0.291	mg/l CaCO3	SM 2340B

Please note that because there are no reporting limits associated with hazardous waste characterizations or micro analyses, this summary does not include hits from these analyses if included in this work order.

Sample Identification	Client Project #	Matrix	Collection Date/Time	Received
Hardness	01-215977.15.00	Surface Water	10-Sep-15 11:00	10-Sep-15
SC12297-01				

CAS No.	Analyte(s)	Result	Flag	Units	*RDL	MDL	Dilution	Method Ref.	Prepared	Analyzed	Analyst	Batch	Cert.
Total Metals by EPA 200/6000 Series Methods													
	Preservation	**Field Preserved**		N/A			1	EPA 200/6000 methods			LNB	1517355	
Total Metals by EPA 200 Series Methods													
7440-70-2	Calcium	**14.8**		mg/l	0.100	0.0642	1	EPA 200.7	15-Sep-15	17-Sep-15	tbc	1517515	X
7439-95-4	Magnesium	**1.91**		mg/l	0.0100	0.0038	1	"	"	"	"	"	X
General Chemistry Parameters													
	Hardness	**44.7**	HD	mg/l CaCO3	0.291	0.178	1	SM 2340B	15-Sep-15	17-Sep-15	tbc	[CALC]	

Total Metals by EPA 200 Series Methods - Quality Control

Analyte(s)	Result	Flag	Units	*RDL	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit
Batch 1517515 - EPA 200 Series										
Blank (1517515-BLK1)					Prepared: 15-Sep-15 Analyzed: 17-Sep-15					
Magnesium	< 0.0100		mg/l	0.0100						
Calcium	< 0.100		mg/l	0.100						
LCS (1517515-BS1)					Prepared: 15-Sep-15 Analyzed: 17-Sep-15					
Magnesium	**1.23**		mg/l	0.0100	1.25		98	85-115		
Calcium	**6.19**		mg/l	0.100	6.25		99	85-115		
Duplicate (1517515-DUP1)			**Source: SC12297-01**		Prepared: 15-Sep-15 Analyzed: 17-Sep-15					
Magnesium	**1.87**		mg/l	0.0100		1.91			2	20
Calcium	**14.5**		mg/l	0.100		14.8			2	20
Matrix Spike (1517515-MS1)			**Source: SC12297-01**		Prepared: 15-Sep-15 Analyzed: 17-Sep-15					
Magnesium	**3.06**		mg/l	0.0100	1.25	1.91	92	70-130		
Calcium	**20.4**		mg/l	0.100	6.25	14.8	91	70-130		
Post Spike (1517515-PS1)			**Source: SC12297-01**		Prepared: 15-Sep-15 Analyzed: 17-Sep-15					
Magnesium	**3.03**		mg/l	0.0100	1.25	1.91	90	85-115		
Calcium	**20.3**		mg/l	0.100	6.25	14.8	89	85-115		

Notes and Definitions

dry	Sample results reported on a dry weight basis
NR	Not Reported
RPD	Relative Percent Difference
HD	Total Hardness is a calculation based on the reported values of Ca and Mg.

Laboratory Control Sample (LCS): A known matrix spiked with compound(s) representative of the target analytes, which is used to document laboratory performance.

Matrix Duplicate: An intra-laboratory split sample which is used to document the precision of a method in a given sample matrix.

Matrix Spike: An aliquot of a sample spiked with a known concentration of target analyte(s). The spiking occurs prior to sample preparation and analysis. A matrix spike is used to document the bias of a method in a given sample matrix.

Method Blank: An analyte-free matrix to which all reagents are added in the same volumes or proportions as used in sample processing. The method blank should be carried through the complete sample preparation and analytical procedure. The method blank is used to document contamination resulting from the analytical process.

Method Detection Limit (MDL): The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is greater than zero and is determined from analysis of a sample in a given matrix type containing the analyte.

Reportable Detection Limit (RDL): The lowest concentration that can be reliably achieved within specified limits of precision and accuracy during routine laboratory operating conditions. For many analytes the RDL analyte concentration is selected as the lowest non-zero standard in the calibration curve. While the RDL is approximately 5 to 10 times the MDL, the RDL for each sample takes into account the sample volume/weight, extract/digestate volume, cleanup procedures and, if applicable, dry weight correction. Sample RDLs are highly matrix-dependent.

Surrogate: An organic compound which is similar to the target analyte(s) in chemical composition and behavior in the analytical process, but which is not normally found in environmental samples. These compounds are spiked into all blanks, standards, and samples prior to analysis. Percent recoveries are calculated for each surrogate.

Continuing Calibration Verification: The calibration relationship established during the initial calibration must be verified at periodic intervals. Concentrations, intervals, and criteria are method specific.

Validated by:
Rebecca Merz

SC12297 [illegible]

SPECTRUM ANALYTICAL, INC.
Featuring
HANIBAL TECHNOLOGY

CHAIN OF CUSTODY RECORD

Page 1 of 1

Special Handling:
- [x] Standard TAT - 7 to 10 business days
- [ ] Rush TAT - Date Needed: _____

All TATs subject to laboratory approval
Min. 24-hr notification needed for rushes
Samples disposed after 60 days unless otherwise instructed

Report To: Todd Donze
ECS Agawam

Telephone #: (413) 789-3530
Project Mgr: Todd Donze

Invoice To: Same

P.O No.: _____ Quote/RQN: extreme

Project No: 01-21597.15.00
Site Name: Kane Scrap Iron and Metal, Inc.
Location: Chicopee State: MA
Sampler(s): Todd Donze

F=Field Filtered 1=$Na_2S_2O_3$ 2=HCl 3=H_2SO_4 4=HNO_3 5=NaOH 6=Ascorbic Acid
7=CH3OH 8=$NaHSO_4$ 9=Deionized Water 10=H_3PO_4 11= ice 12= _____

DW=Dinking Water GW=Groundwater SW=Surface Water WW=Waste Water
O=Oil SO=Soil SL=Sludge A=Indoor/Ambient Air SG=Soil Gas
X1= _____ X2= _____ X3= _____

G= Grab C=Composite

List Preservative Code Below:

QA/QC Reporting Notes:
* additional charges may apply

MA DEP MCP CAM Report? ☐ Yes ☐ No
CT DPH RCP Report? ☐ Yes ☐ No
☐ Standard ☐ Ne QC ☐ DQA*
☐ ASP A* ☐ ASP B*
☐ NJ Reduced* ☐ NJ Full*
☐ Tier II* ☐ Tier IV*
☐ Other: _____
State-specific reporting standards*

Lab ID:	Sample ID:	Date:	Time:	Type	Matrix	# of VOA Vials	# of Amber Glass	# of Clear Glass	# of Plastic	Analysis: Hardness	Check if chlorinated
SC12297-01	Hardness	9/10/15	1100	G	SW				1	X	☐
											☐
											☐
											☐
											☐
											☐
											☐
											☐
											☐
											☐

Relinquished by:	Received by:	Date:	Time:	Temp °C
Todd Donze	AA	9/10/15	11:30	Observed 1.0
				Correction Factor -1.0
				Corrected 0
				IR ID: 01

☐ EDD format:
☑ E-mail to: tdonze@ecsconsult.com

Condition upon receipt: Custody Seals: ☐ Present ☐ Intact ☐ Broken
☐ Ambient ☒ Iced ☐ Refrigerated ☐ DI VOA Frozen ☐ Soil Jar

ATTACHMENT C

Cover Letters and UPS Receipts for September 25, 2015 and October 1, 2015
Submittals to EPA and MassDEP

ecs WHERE BUSINESS AND THE ENVIRONMENT CONVERGE

588 Silver Street, Agawam, MA 01001 tel 413.789.3530 fax 413.789.2776 www.ecsconsult.com

U.S. Environmental Protection Agency
Office of Water, Water Permits Division
Code 4203M, ATTN: MSGP Reports
Pennsylvania Avenue, NW
Washington, DC 20460

October 1, 2015
Project No. 01-215977
Document No. 45044

Re: EPA NPDES Stormwater MSGP Quarterly Benchmark Monitoring Results
Kane Scrap Iron & Metal, Inc. - 184 East Meadow Street, Chicopee, MA (MAR05DY90)

To Whom It May Concern:

Environmental Compliance Services, Inc. (ECS) is submitting the attached historical stormwater benchmark monitoring results on behalf of Kane Scrap Iron & Metal, Inc. (Kane) located at 184 East Meadow Street in Chicopee, Massachusetts (MAR05DY90). Specifically, stormwater monitoring results for the fourth quarter of 2011, second quarter of 2012, second quarter of 2013 and fourth quarter of 2014 are attached. During a recent records review, it was determined that these results may not have been submitted to EPA.

If you have any questions or comments, please contact us.

Sincerely,
ENVIRONMENTAL COMPLIANCE SERVICES, INC.

Matthew Reiser, CHMM
Compliance Specialist

MR/ajr
Attachments

cc: Robert Kane, Jr., Kane Scrap Iron & Metal, Inc.

Amy Ringuette <aringuette@ecsconsult.com>

UPS Delivery Notification, Tracking Number 1Z091F0W0398461430

1 message

UPS Quantum View <auto-notify@ups.com> Tue, Oct 6, 2015 at 11:06 AM
Reply-To: auto-notify@ups.com
To: aringuette@ecsconsult.com

***Do not reply to this e-mail. UPS and Environmental Compliance Services will not receive your reply.

At the request of Environmental Compliance Services, this notice is to confirm that the following shipment has been delivered.

Important Delivery Information

Tracking Number: 1Z091F0W0398461430
Delivery Date / Time: 06-October-2015 / 11:00 AM

Delivery Location Left At: FRONT DESK
Signed by: MAY

Shipment Detail

Ship To:
MSGP Reports
U.S. EPA
1200 PENNSYLVANIA AVE NW
ROOM 7420
WASHINGTON
DC
20460
US

Number of Packages:	1
UPS Service:	GROUND
Weight:	1.0 LBS
Transaction Reference Number:	215977/45044 - ajr
Transaction Reference Number:	Shipment Reference #2

ENVIRONMENTAL COMPLIANCE SERVICES, INC.

588 Silver Street, Agawam, MA 01001 tel 413.789.3530 fax 413.789.2776 www.ecsconsult.com

MassDEP - Western Region
436 Dwight Street
Springfield, MA 01103

September 25, 2015
Project No. 01-215977
Document No. 45004

Attn: Paul Nietupski

RE: EPA NPDES Stormwater MSGP Benchmark Monitoring Results
Kane Scrap Iron & Metal, Inc.
184 East Meadow Street
Chicopee, Massachusetts

Dear Mr. Nietupski:

Environmental Compliance Services, Inc. (ECS) is submitting the attached stormwater benchmark monitoring results on behalf of Kane Scrap Iron & Metal, Inc. (Kane) located at 184 East Meadow Street in Chicopee, Massachusetts. As you may be aware, per the EPA NPDES Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (Stormwater MSGP), the results of any monitoring required by the MSGP must be sent to the Regional Office of the DEP where the monitoring identifies violations of any benchmarks for any parameter for which monitoring is required.

It should be noted that a Stormwater Pollution Prevention (SWPP) Plan has been prepared for and implemented by Kane. This SWPP Plan describes the control measures, e.g., good housekeeping, exposure minimization, spill prevention and response, that Kane has implemented in an effort to minimize the likelihood of off-site stormwater pollution. Additionally, Kane has and continues to identify control measures and corrective actions aimed at minimizing the pollutants in its stormwater discharge. A synopsis of these corrective actions to date include:

2011:
- Sediment blockers in the catch basins that discharge stormwater off site;

2012:
- Bi-weekly manual sweeping within a thirty foot radius around these catch basins;
- Weekly sweeping of paved areas via a purchased mobile street sweeper;
- Installation of asphalt curbing along non-paved areas;

2013:
- Continued weekly sweeping of paved areas via a purchased mobile street sweeper;
- Installation of silt fence/straw bale barriers around unpaved and production/storage areas;

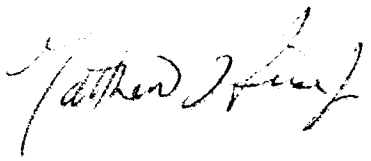
2014:
- Continued weekly sweeping of paved areas via a purchased mobile street sweeper;
- Evaluation of filtration inserts for catch basins that discharge stormwater off site;

2015:
- Continued weekly sweeping of paved areas via a purchased mobile street sweeper; and
- Purchase of CleanWay Storm Clean catch basin filtration inserts for these catch basins.

Through the employ of these control measures, Kane has reduced the levels of pollutants in its stormwater discharge. As the CleanWay Storm Clean catch basin filtration inserts are made to order, Kane hopes to receive and install them by the end of the year. It is anticipated that these filtration devices will continue to reduce the levels of pollutants in stormwater discharge from the facility.

If you have any questions or comments, please contact us.

Sincerely,
ENVIRONMENTAL COMPLIANCE SERVICES, INC.



Matthew Reiser, CHMM
Compliance Specialist

MR/kab
Attachments

cc: Robert Kane, Jr., Kane Scrap Iron & Metal, Inc.

Kelly Blase <kblase@ecsconsult.com>

UPS Delivery Notification, Tracking Number 1Z091F0W0398356410

1 message

UPS Quantum View <auto-notify@ups.com> Mon, Sep 28, 2015 at 10:14 AM
Reply-To: auto-notify@ups.com
To: kblase@ecsconsult.com

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At the request of Environmental Compliance Services, this notice is to confirm that the following shipment has been delivered.

Important Delivery Information

Tracking Number: 1Z091F0W0398356410
Delivery Date / Time: 28-September-2015 / 10:05 AM

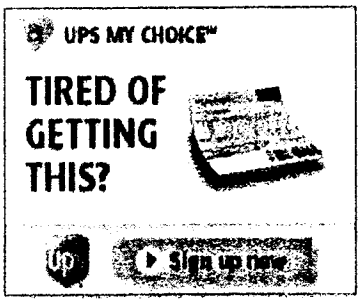
Delivery Location: OFFICE
Signed by: LEPLANTE

Shipment Detail

Ship To:
Mr. Paul Nietupski
MassDEP
436 DWIGHT ST
ROOM 500
SPRINGFIELD
MA
01103
US

Number of Packages:	1
UPS Service:	GROUND
Weight:	1.0 LBS

Transaction Reference Number: Shipment Reference #1
Transaction Reference Number: Shipment Reference #2/215977/45004



ATTACHMENT D

2012, 2013 and 2014 Annual Reports

NPDES Permit Tracking No.:
MAR05DY90

EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name: Kane Scrap Iron and Metal, Inc.

2. NPDES Permit Tracking No.: MAR05DY90

3. Facility Physical Address:

a. Street: 184 East Meadow Street

b. City: Chicopee c. State: MA d. Zip Code: 01013-

4. Lead Inspectors Name: Robert E. Kane III Title: Non-Ferrous Metals Manager

Additional Inspectors Name(s): Todd Donze Environ. Consultant

5. Contact Person: Robert E. Kane III Title: Non-Ferrous Metals Manager

Phone: 413-594-5160 Ext. E-mail: kanescrap@gmail.com

6. Inspection Date: 09/27/2012

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☑ YES ☐ NO

If NO, describe why not:

NOTE: Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☑ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

NPDES Permit Tracking No.:
MAR05DY90

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☑ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☑ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

The facility quarterly storm water discharge visual exams and benchmark monitoring data for precipitation/sample events occurring on December 22, 2011, March 2, 2012, June 22, 2012, and September 18, 2012 were reviewed at the time of the annual inspection. No potential issues and/or concerns were identified in regards to information documented via quarterly visual inspection forms. However, the applicable MSGP standards for COD, TSS, Al, Cu, Fe, Pb, and Zn were exceeded in samples collected at DA-001 and DA-002 on December 22, 2011, March 2, 2012, and June 22, 2012.

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

Negligible amounts of fine sand/sediment were observed at paved locations encompassing DA-001 and DA-002 and other various areas throughout the Kane facility property during this inspection. No wind blown litter or other indicators of pollutants which could potentially impact storm water were observed.

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?

☑ YES ☐ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions? 01

NOTE: Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.

NPDES Permit Tracking No.:
MAR05DY90

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA 001:

1. Brief Description:

Negligible amounts of fine sand/sediment were observed at the paved area encompassing DA-001 and other various areas throughout the Kane facility property during this inspection.

2. Are any control measures in need of maintenance or repair? ☐ YES ☑ NO

3. Have any control measures failed and require replacement? ☐ YES ☑ NO

4. Are any additional/revised control measures necessary in this area? ☑ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

Facility personnel anticipate to implement/schedule more frequent sweeping control measures of paved areas, with empathise to areas adjacent to DA-001. When deemed unreasonable to employee a street sweeper, on a bi-weekly basis Kane shall sweep areas within a thirty foot radius of DA-001 manually via broom. In addition, Kane facility management anticipates the installation of silt fence/straw bale barriers to encompass unpaved and production/storage areas.

INDUSTRIAL ACTIVITY AREA DA-002:

1. Brief Description:

Negligible amounts of fine sand/sediment were observed at the paved area encompassing DA-002 and other various areas throughout the Kane facility property during this inspection.

2. Are any control measures in need of maintenance or repair? ☐ YES ☑ NO

3. Have any control measures failed and require replacement? ☐ YES ☑ NO

4. Are any additional/revised c necessary in this area? ☑ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

Facility personnel anticipate to implement/schedule more frequent sweeping control measures of paved areas, with empathise to areas adjacent to DA-002. When deemed unreasonable to employee a street sweeper, on a bi-weekly basis Kane shall sweep areas within a thirty foot radius of DA-002 manually via broom. In addition, Kane facility management anticipates the installation of silt fence/straw bale barriers to encompass unpaved and production/storage areas.

INDUSTRIAL ACTIVITY AREA _____:

Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
MAR05DY90

NOTE: Copy this page and attach additional pages as necessary

INDUSTRIAL ACTIVITY AREA ______:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA ______:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA ______:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
MAR05DY90

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 01 of 01 for this reporting period.

2. Is this corrective action:

- ☑ An update on a corrective action from a previous annual report; or
- ☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
- ☐ Numeric effluent limitation exceedance
- ☑ Control measures inadequate to meet applicable water quality standards
- ☐ Control measures inadequate to meet non-numeric effluent limitations
- ☐ Control measures not properly operated or maintained
- ☐ Change in facility operations necessitated change in control measures
- ☑ Average benchmark value exceedance
- ☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

It is anticipated that the four (4) quarter average for COD, TSS, Al, Cu, Fe, Pb, and Zn will exceed the applicable MSGP benchmark monitoring standards regarding samples collected at DA-001and DA-002.

5. Date problem identified: 09/27/2012

6. How problem was identified:

- ☐ Comprehensive site inspection
- ☐ Quarterly visual assessment
- ☐ Routine facility inspection
- ☑ Benchmark monitoring
- ☐ Notification by EPA or State or local authorities
- ☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

Facility personnel anticipate to implement/schedule more frequent sweeping control measures of paved areas, with empathise to areas adjacent to DA-001 and DA-002. As described above, on a bi-weekly basis Kane shall sweep areas encompassing a thirty foot radius of DA-001 and DA-002 manually via broom. In addition, Kane facility management anticipates the installation of silt fence/straw bale barriers to contain unpaved and production/storage areas.

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☑ NO

9. Date corrective action initiated: 09/27/2012

10. Date corrective action completed: __/__/____ or expected to be completed: __/__/____

11. If corrective action not yet completed, provide the status of corrective action at the end of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action.

As soon as possible and subsequent cleaning activities to be performed on a bi-weekly basis and/or as deemed necessary (See Sections above).

NPDES Permit Tracking No.:
MAR05DY90

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? [X] YES [ ] NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Printed Name: Robert E. Kane III Title: Non-Ferrous Metals Manager

Signature: [signature] Date Signed: 9/27/12

NPDES Permit Tracking No.:
MAR05DY90

EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name: Kane Scrap Iron and Metal, Inc.

2. NPDES Permit Tracking No.: MAR05DY90

3. Facility Physical Address:

a. Street: 184 East Meadow Street

b. City: Chicopee c. State: MA d. Zip Code: 01013-

4. Lead Inspectors Name: Robert E. Kane III Title: Non-ferrous metals manager

Additional Inspectors Name(s): Todd Donze Environ. Consultant

5. Contact Person: Robert E. Kane III Title: Non-ferrous metals manager

Phone: 413-594-5160 Ext. E-mail: kanescrap@gmail.com

6. Inspection Date: 09/27/2013

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☑ YES ☐ NO

If NO, describe why not:

NOTE: *Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.*

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☑ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

NPDES Permit Tracking No.:
MAR05DY90

3 Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☑ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☑ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

The facility quarterly storm water discharge visual exams and benchmark monitoring data for precipitation/sample events occurring on December 16, 2012, February 23, 2013, June 28, 2013, and September 21, 2013 were reviewed at the time of the annual inspection. Note that the benchmark monitoring data concerning the September 21, 2013 sample event was not available at the time of the annual inspection and consequently, these results were reviewed at a later date. No potential issues and/or concerns were identified in regards to information documented via quarterly visual inspection forms. However, the applicable MSGP standards for COD, Al, Cu, Fe, and/or Zn were exceeded in samples collected at DA-001 and/or DA-002 on December 16, 2012, February 23, 2013, June 28, 2013, and/or September 21, 2013. It should be noted that the four (4) quarter average for TSS and Pb at DA-001 and DA-002 did not exceed the applicable MSGP Benchmark Standards; therefore, Kane has fulfilled the monitoring requirements regarding these parameters for the remainder of the current permit term.

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring.

Negligible amounts of fine sand/sediment were observed at paved locations encompassing DA-001 and DA-002 and other various areas throughout the Kane facility property during this inspection. No wind blown litter and/or other indicators of pollutants which could potentially impact storm water were observed.

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?
☑ YES ☐ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions? 0 1

***NOTE:** Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.*

NPDES Permit Tracking No.:
MAR05DY90

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA 001:

1. Brief Description:

Negligible amounts of fine sand/sediment were observed at the paved area encompassing DA-001 and other various areas throughout the Kane facility property during this inspection.

2. Are any control measures in need of maintenance or repair?	☐ YES	☑ NO
3. Have any control measures failed and require replacement?	☐ YES	☑ NO
4. Are any additional/revised control measures necessary in this area?	☑ YES	☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

Facility personnel anticipate to implement/schedule more frequent (weekly) sweeping control measures of paved areas via mobile street sweeper, with empathise to areas adjacent to DA-001. Since the September 27, 2012 annual inspection, Kane has purchased a mobile street sweeper to complete bi-weekly sweeping control measures and in addition, installed silt fence/straw bale barriers to encompass production/storage areas.

INDUSTRIAL ACTIVITY AREA DA-002:

1. Brief Description:

Negligible amounts of fine sand/sediment were observed at the paved area encompassing DA-002 and other various areas throughout the Kane facility property during this inspection.

2. Are any control measures in need of maintenance or repair?	☐ YES	☑ NO
3. Have any control measures failed and require replacement?	☐ YES	☑ NO
4. Are any additional/revised c necessary in this area?	☑ YES	☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

Facility personnel anticipate to implement/schedule more frequent (weekly) sweeping control measures of paved areas via mobile street sweeper, with empathise to areas adjacent to DA-002. Since the September 27, 2012 annual inspection, Kane has purchased a mobile street sweeper to complete bi-weekly sweeping control measures and in addition, installed silt fence/straw bale barriers to encompass production/storage areas.

INDUSTRIAL ACTIVITY AREA _____:

Brief Description:

2. Are any control measures in need of maintenance or repair?	☐ YES	☐ NO
3. Have any control measures failed and require replacement?	☐ YES	☐ NO
4. Are any additional/revised BMPs necessary in this area?	☐ YES	☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.: MAR05DY90

NOTE: Copy this page and attach additional pages as necessary

INDUSTRIAL ACTIVITY AREA ______:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO
3. Have any control measures failed and require replacement? ☐ YES ☐ NO
4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA ______:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO
3. Have any control measures failed and require replacement? ☐ YES ☐ NO
4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA ______:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO
3. Have any control measures failed and require replacement? ☐ YES ☐ NO
4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
MAR05DY90

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 01 of 01 for this reporting period.

2. Is this corrective action:

- ☑ An update on a corrective action from a previous annual report; or
- ☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
- ☐ Numeric effluent limitation exceedance
- ☑ Control measures inadequate to meet applicable water quality standards
- ☐ Control measures inadequate to meet non-numeric effluent limitations
- ☐ Control measures not properly operated or maintained
- ☐ Change in facility operations necessitated change in control measures
- ☑ Average benchmark value exceedance
- ☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

The four (4) quarter average for COD, Al, Cu, Fe, and Zn have exceeded the applicable MSGP benchmark monitoring standards regarding samples collected at DA-001and DA 002. Note that these parameters have indicated a decreasing trend over time and with increased control measures.

5. Date problem identified: 09/27/2013

6. How problem was identified:

- ☐ Comprehensive site inspection
- ☐ Quarterly visual assessment
- ☐ Routine facility inspection
- ☑ Benchmark monitoring
- ☐ Notification by EPA or State or local authorities
- ☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

Facility personnel anticipate to implement/schedule more frequent (weekly) sweeping control measures of paved areas via mobile street sweeper, with empathise to areas adjacent to DA-001 and DA-002. Since the September 27, 2012 annual inspection, Kane has purchased a mobile street sweeper to complete bi-weekly sweeping control measures and in addition, installed silt fence/straw bale barriers to encompass production/storage areas.

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☑ NO

9. Date corrective action initiated: 09/27/2013

10. Date correction action completed: __/__/____ or expected to be completed: __/__/____

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action.

As soon as possible, sweeping control measures to be performed on a weekly basis and/or as deemed necessary(See Sections above).

NPDES Permit Tracking No.: MAR05DY90

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☑ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Printed Name: Robert E. Kane III

Title: [illegible]

Signature: [signature]

Date Signed: 9/27/10

ecs WHERE BUSINESS AND THE ENVIRONMENT CONVERGE

588 Silver Street, Agawam, MA 01001 tel 413.789.3530 fax 413.789.2776 www.ecsconsult.com

Environmental Protection Agency
Office of Water, Water Permits Division
Code 4203M, ATTN: MSGP Reports
Pennsylvania Avenue, NW
Washington, D.C. 20460

October 1, 2014
Project No. 01-215977.14.0Q
Document No,

RE: NPDES Multi-Sector General Permit
Annual Storm Water Comprehensive Site Inspection
MSGP Tracking Number: MAR05DY90

Dear Sir/Madam:

On behalf of Kane Scrap Iron and Metal, Inc. (Kane) and in accordance with the requirements of the 2008 Multi-Sector General Permit regarding Storm Water Discharge Associated with Industrial Activity (MSGP) under the National Pollutant Discharge Elimination System (NPDES), Environmental Compliance Services, Inc. (ECS) is providing the attached Annual Reporting Form for the 2013 — 2014 monitoring period associated with the facility located at 184 East Meadow Street in Chicopee, Massachusetts.

If you have any questions and/or concerns regarding any of this information, please do not hesitate to contact this office at (413) 789-3530 at your convenience.

Sincerely,
ENVIRONMENTAL COMPLIANCE SERVICES, INC.

Todd Donze
Environmental Scientist

NPDES Permit Tracking No.:
MAR05DY90

EPA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name: Kane Scrap Iron and Metal, Inc.

2. NPDES Permit Tracking No.: MAR05DY90

3. Facility Physical Address:

a. Street: 184 East Meadow Street

b. City: Chicopee c. State: MA d. Zip Code: 01013-

4. Lead Inspectors Name: Robert E. Kane Title: Vice President, Metals Management

Additional Inspectors Name(s): Todd Donze Environ. Consultant

5. Contact Person: Robert E. Kane III Title: Vice President, Metals Management

Phone: 413-594-5160 Ext. E-mail: kanescrap@gmail.com

6. Inspection Date: 09/29/2014

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☑ YES ☐ NO

If NO, describe why not:

NOTE: Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☑ NO

If YES, for each location, describe the sources of these stormwater and non-stormwater discharges and any associated control measures in place:

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3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☑ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place.

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☑ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from the review.

The quarterly facility storm water discharge visual exams and benchmark monitoring data for precipitation/sample events occurring on December 21, 2013, March 29, 2014, June 26, 2014, and September 13, 2014 were reviewed at the time of the annual inspection. Note that the benchmark monitoring data concerning the September 13, 2014 sample event was not available at the time of the annual inspection and consequently, these results were reviewed at a later date. No potential issues and/or concerns were identified in regards to information documented via quarterly visual inspection forms. However, the applicable MSGP standards for COD, Al, Cu, Fe, and/or Zn were exceeded in samples collected at DA-001 and/or DA-002 on December 21, 2013, March 29, 2014, June 26, 2014, and/or September 13, 2014. Note that the monitoring requirements for TSS and Pb were fulfilled during the 2013 - 2014 monitoring period.

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of any ground outfalls, including flow dissipation measures to prevent scouring.

Negligible amounts of fine sand/sediment were observed at paved locations encompassing DA-001 and DA-002 and other various areas throughout the Kane facility property during this inspection. No wind blown litter and/or other indicators of pollutants which could potentially impact storm water were observed.

6. Have you taken or do you plan to take any corrective actions, as specified in Part 4 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?

☑ YES ☐ NO

If YES, how many conditions requiring review for corrective action as specified in Parts 4.1 and 4.2 were addressed by these corrective actions? 0 1

NOTE: Complete the attached Corrective Action Form (Section 6) for each condition identified requiring any corrective action as a result of the comprehensive stormwater inspection.

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6. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA 001

1. Brief Description:

Negligible amounts of fine sand/sediment were observed at the paved area encompassing OA-001 and other various areas throughout the Kane facility property during this inspection.

2. Are any control measures in need of maintenance or repair? [ ] YES [X] NO

3. Have any control measures failed and require replacement? [ ] YES [X] NO

4. Are any additional/revised control measures necessary in this area? [X] YES [ ] NO

If YES to any of these three questions, provide a description of the problem. (Any necessary corrective actions should be described on the attached Corrective Action Form)

Facility personnel anticipate to implement/schedule more frequent sweeping control measures of paved areas via mobile street sweeper, with emphasis to areas adjacent to OA-001. The Kane facility is currently evaluating the installation of a catch basin filtration system insert in OA-001.

INDUSTRIAL ACTIVITY AREA OA-002

1. Brief Description:

Negligible amounts of fine sand/sediment were observed at the paved area encompassing OA-002 and other various areas throughout the Kane facility property during this inspection.

2. Are any control measures in need of maintenance or repair? [ ] YES [X] NO

3. Have any control measures failed and require replacement? [ ] YES [X] NO

4. Are any additional/revised c necessary in this area? [X] YES [ ] NO

If YES to any of these three questions, provide a description of the problem. (Any necessary corrective actions should be described on the attached Corrective Action Form)

Facility personnel anticipate to implement/schedule more frequent sweeping control measures of paved areas via mobile street sweeper, with emphasis to areas adjacent to OA-002. The Kane facility is currently evaluating the installation of a catch basin filtration system insert in OA-002.

INDUSTRIAL ACTIVITY AREA _____

Brief Description:

2. Are any control measures in need of maintenance or repair? [ ] YES [ ] NO

3. Have any control measures failed and require replacement? [ ] YES [ ] NO

4. Are any additional/revised BMPs necessary in this area? [ ] YES [ ] NO

If YES to any of these three questions, provide a description of the problem. (Any necessary corrective actions should be described on the attached Corrective Action Form)

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NOTE: Copy this page and attach additional pages as necessary

INDUSTRIAL ACTIVITY AREA ______:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA ______:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA ______:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

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D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # 01 of 01 for this reporting period.

2. Is this corrective action:

- ☑ An update on a corrective action from a previous annual report, or
- ☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
- ☐ Numeric effluent limitation exceedance
- ☑ Control measures inadequate to meet applicable water quality standards
- ☐ Control measures inadequate to meet non-numeric effluent limitations
- ☐ Control measures not properly operated or maintained
- ☐ Change in facility operations necessitated change in control measures
- ☑ Average benchmark value exceedance
- ☐ Other (describe):

4. Briefly describe the nature of the problem identified:

The four (4) quarter average for Al, Cu, Fe, and Zn have exceeded the applicable MSGP benchmark monitoring standards regarding samples collected at DA-001 and DA-002. Note that these parameters have indicated a decreasing trend over time and with increased control measures.

5. Date problem identified: 09 / 29 / 2014

6. How problem was identified:

- ☐ Comprehensive site inspection
- ☐ Quarterly visual assessment
- ☐ Routine facility inspection
- ☑ Benchmark monitoring
- ☐ Notification by EPA or State or local authorities
- ☐ Other (describe):

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

Facility personal anticipate to implement/schedule more frequent sweeping control measures of paved areas via mobile street sweeper, with empathise to areas adjacent to DA-001 and DA-002. The Kane facility is currently evaluating the installation of a catch basin filtration system inserts in DA-001 and DA-002.

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☐ NO

9. Date corrective action initiated: 09 / 29 / 2014

10. Date corrective action completed: __ / __ / ____ or expected to be completed: __ / __ / ____

11. If corrective action not yet completed, provide the status of corrective action at the time of this comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

As soon as possible, the Kane facility is currently evaluating the installation of a catch basin filtration system inserts in DA-001 and DA-002 (See Sections above)

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E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☒ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

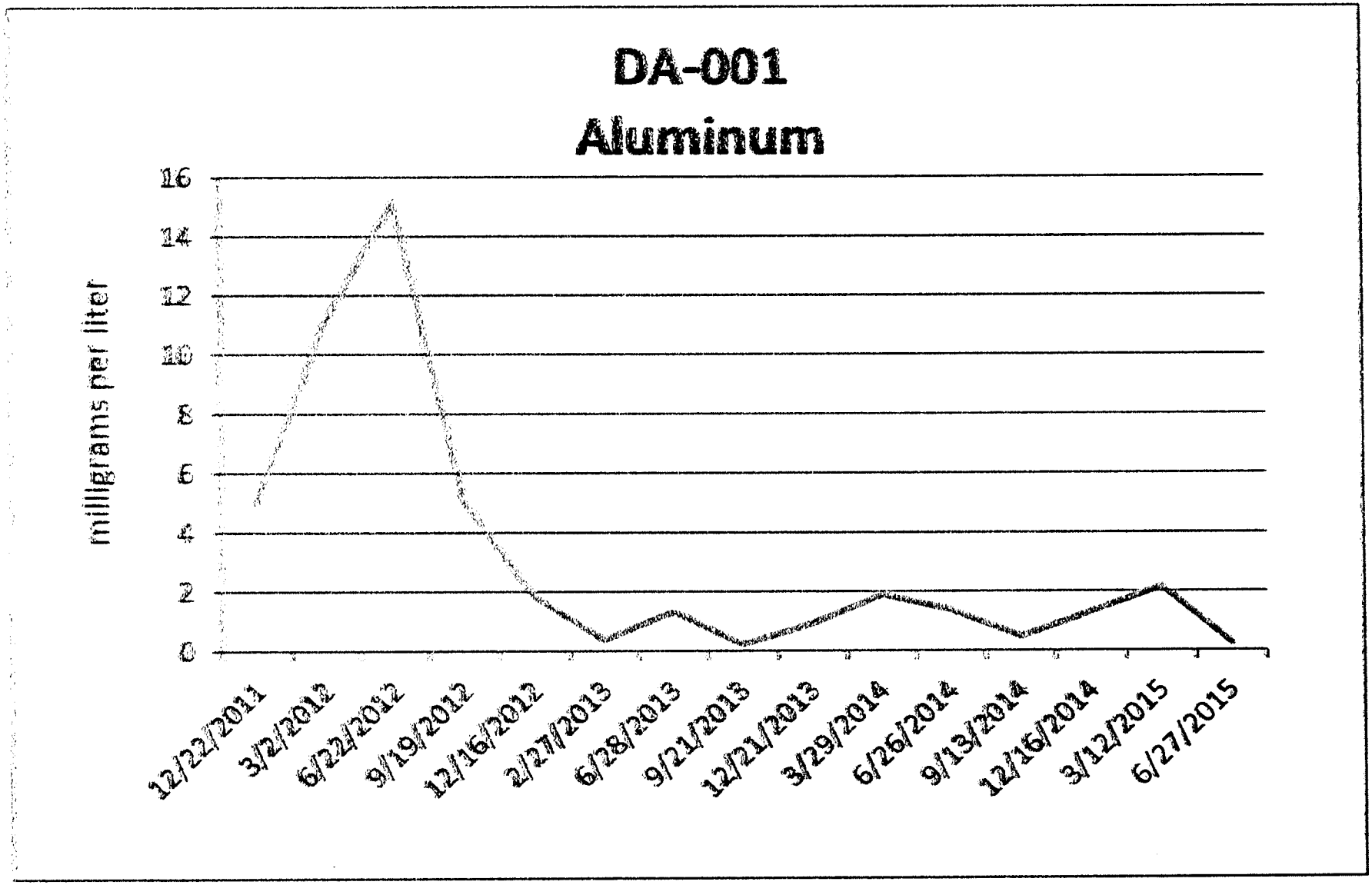
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

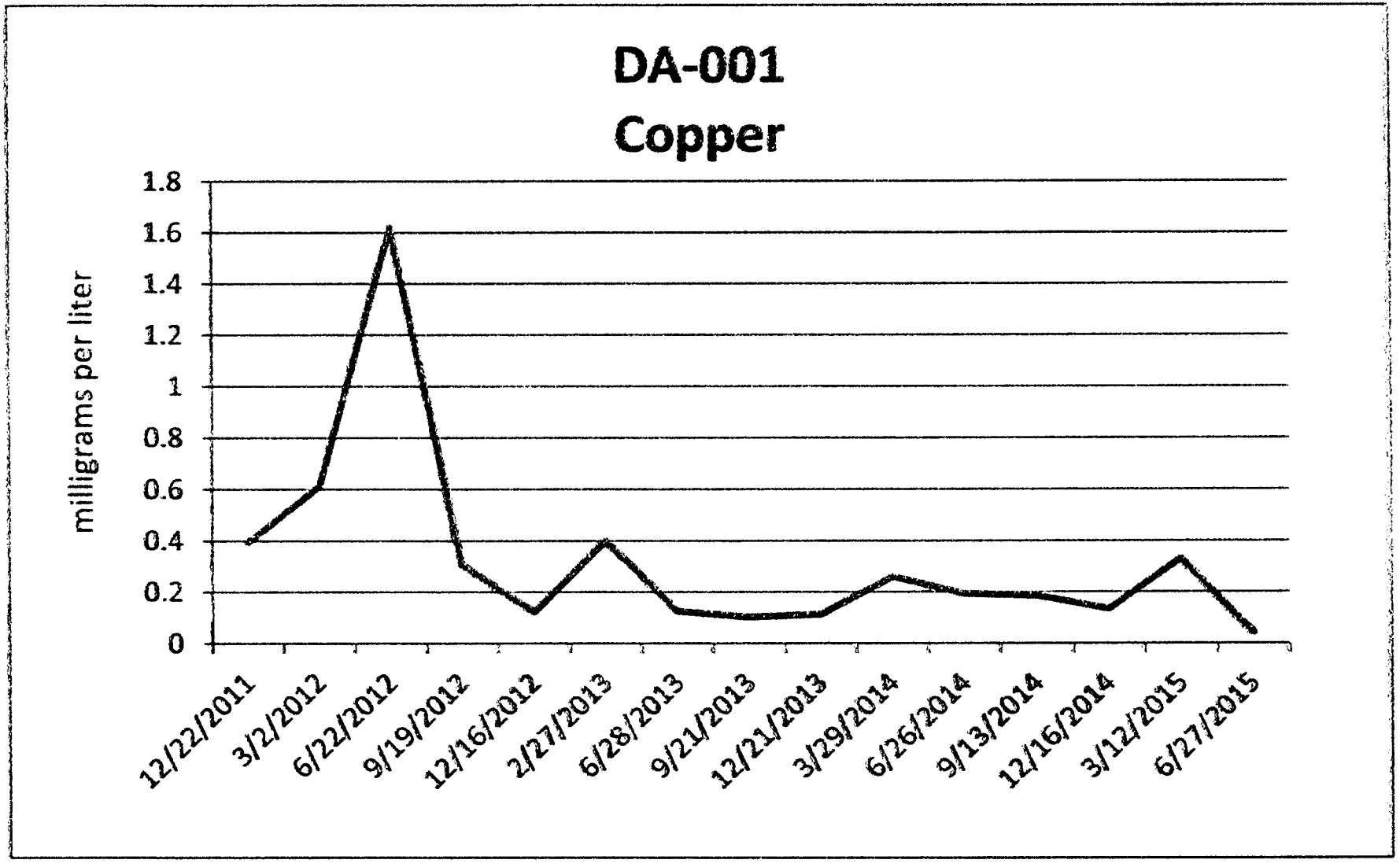
Authorized Representative Printed Name: Robert E. Kains III Title: Vice President, Public Affairs

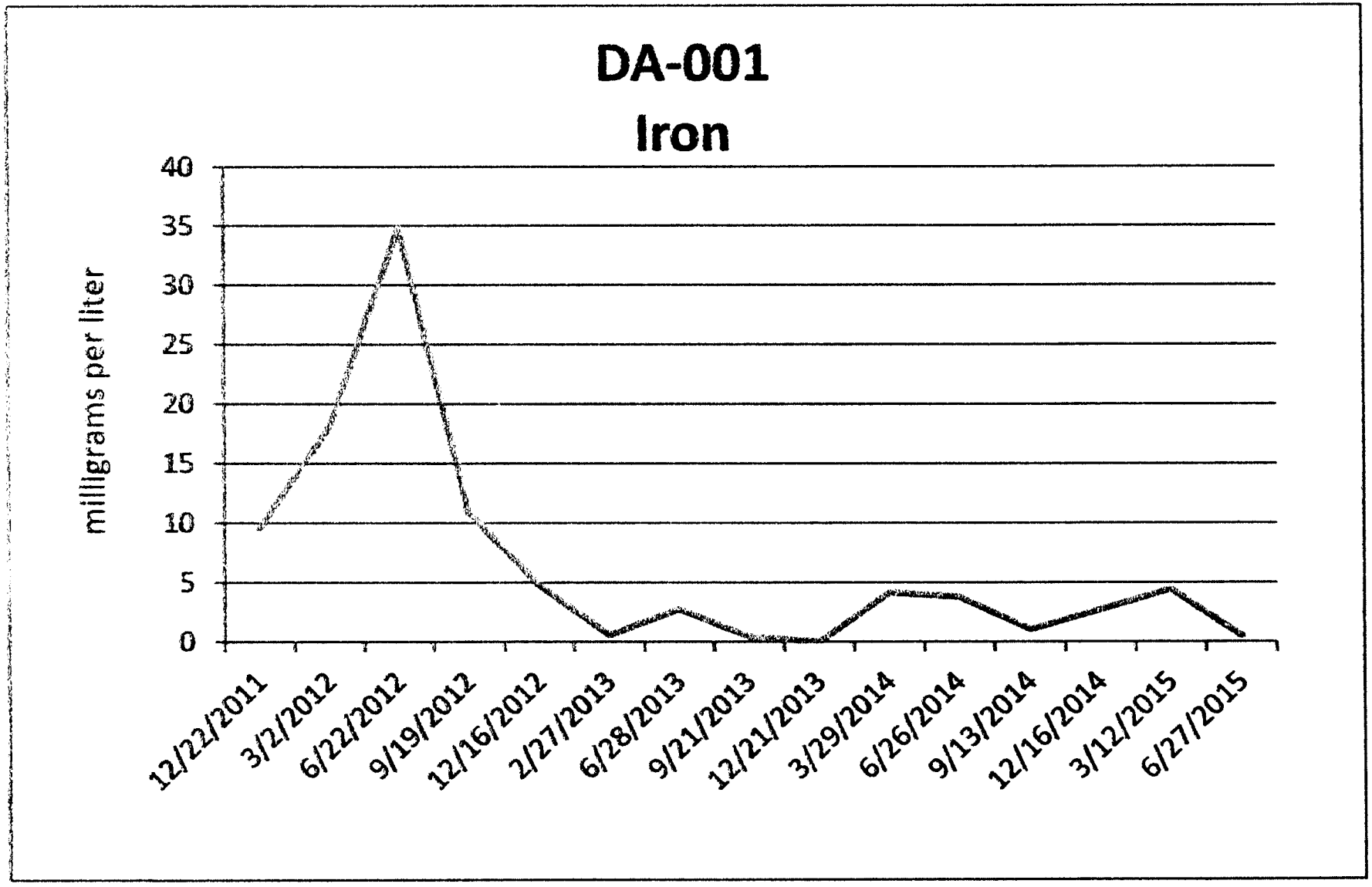
Signature: [signature] Date Signed: 9/30/14

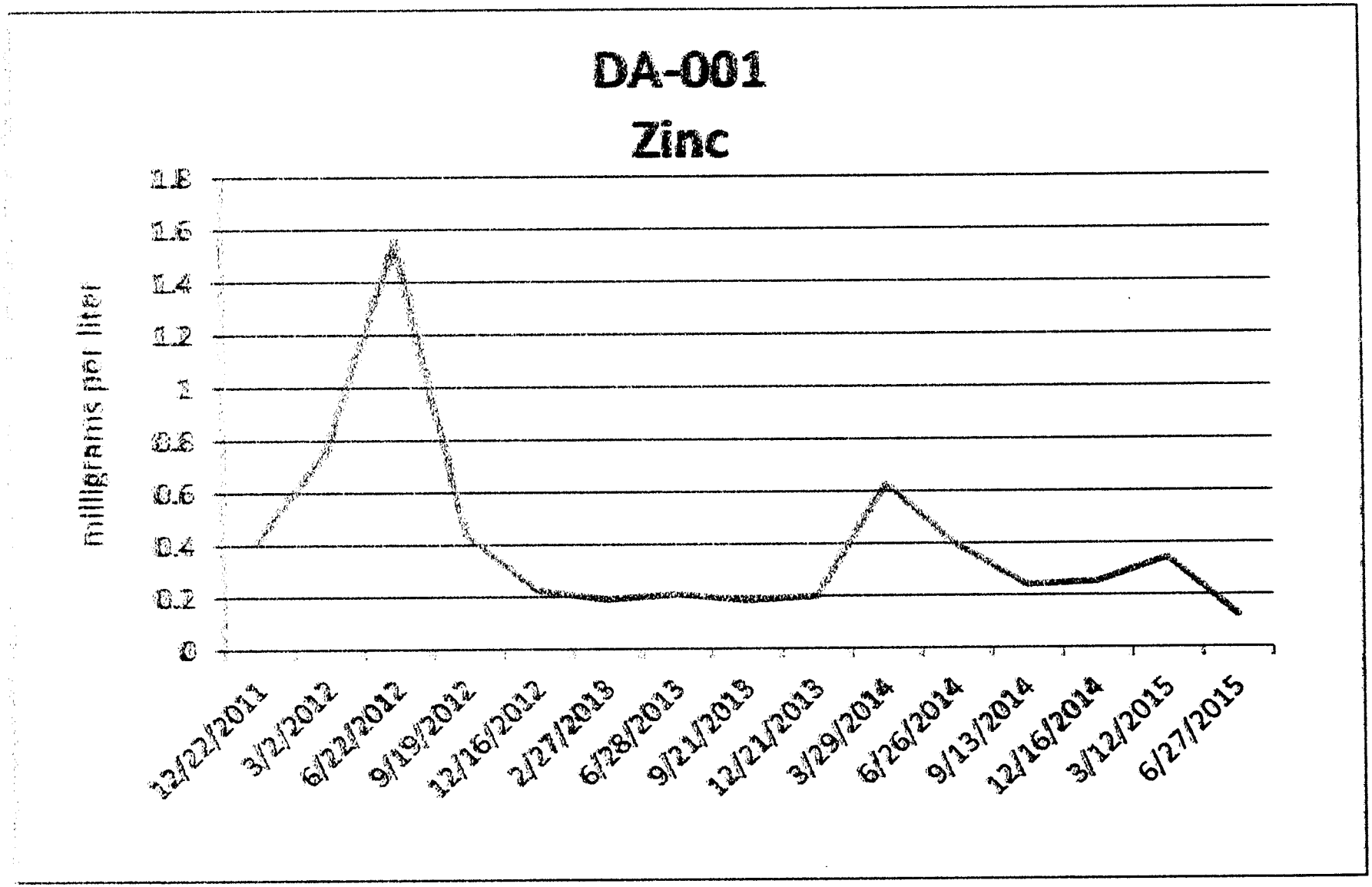
ATTACHMENT E

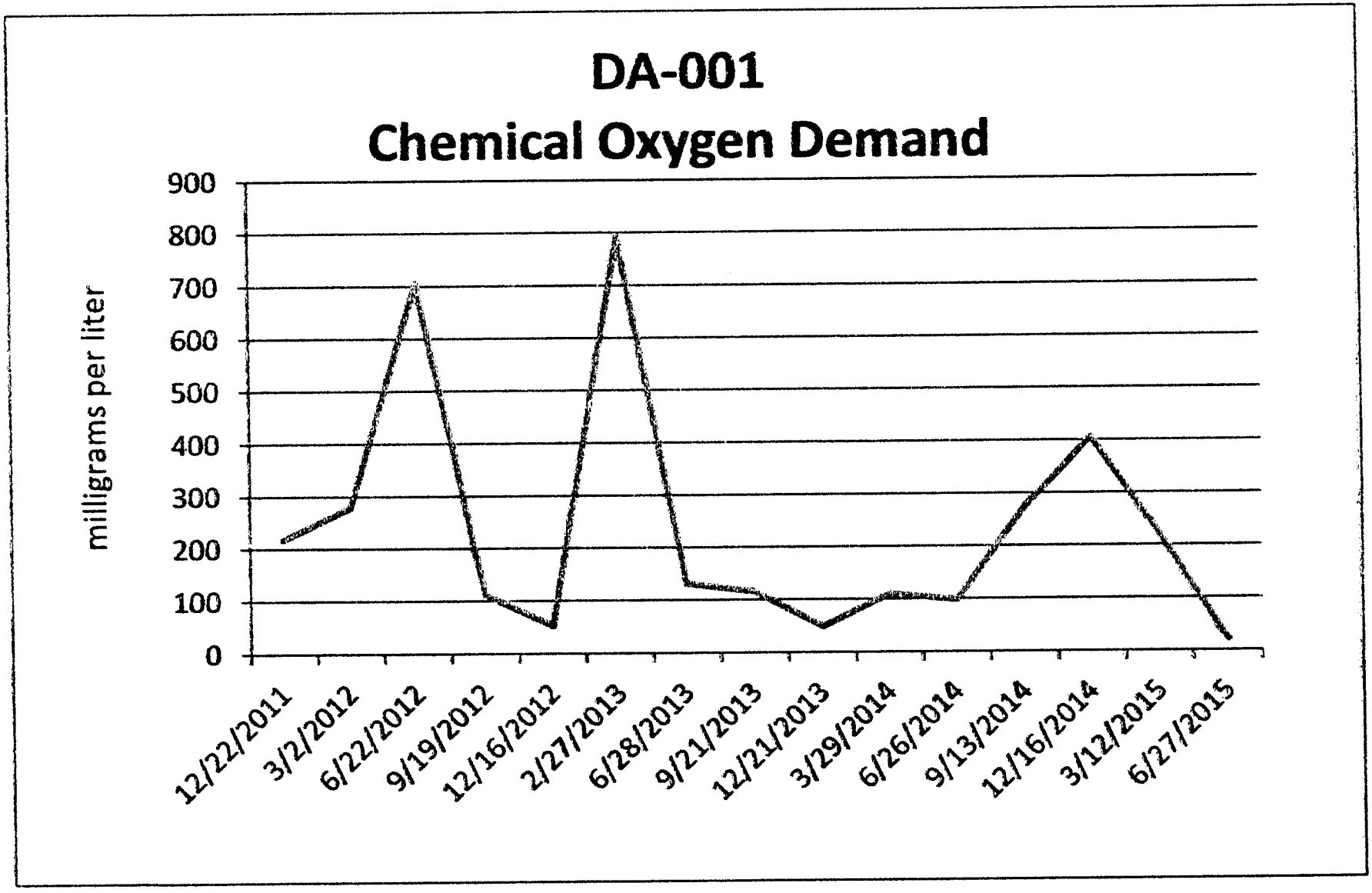
Aluminum, Copper, Iron, Zinc and Chemical Oxygen Demand
Line Graphs for DA-001 and DA-002

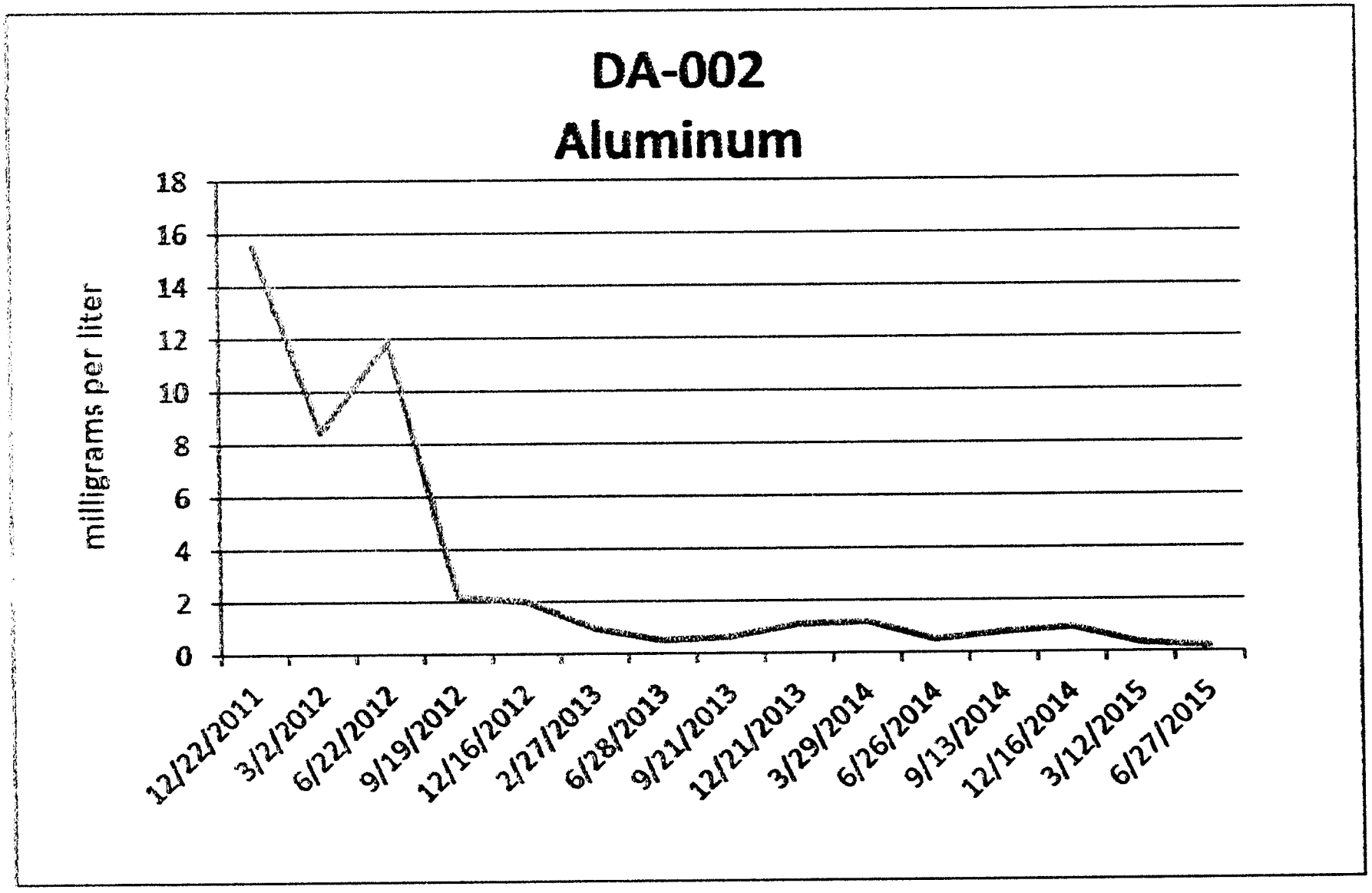

DA-001
Aluminum
milligrams per liter
16
14
12
10
8
6
4
2
0
12/22/2011
3/2/2012
6/22/2012
9/19/2012
12/16/2012
2/27/2013
6/28/2013
9/21/2013
12/21/2013
3/29/2014
6/26/2014
9/13/2014
12/16/2014
3/12/2015
6/27/2015

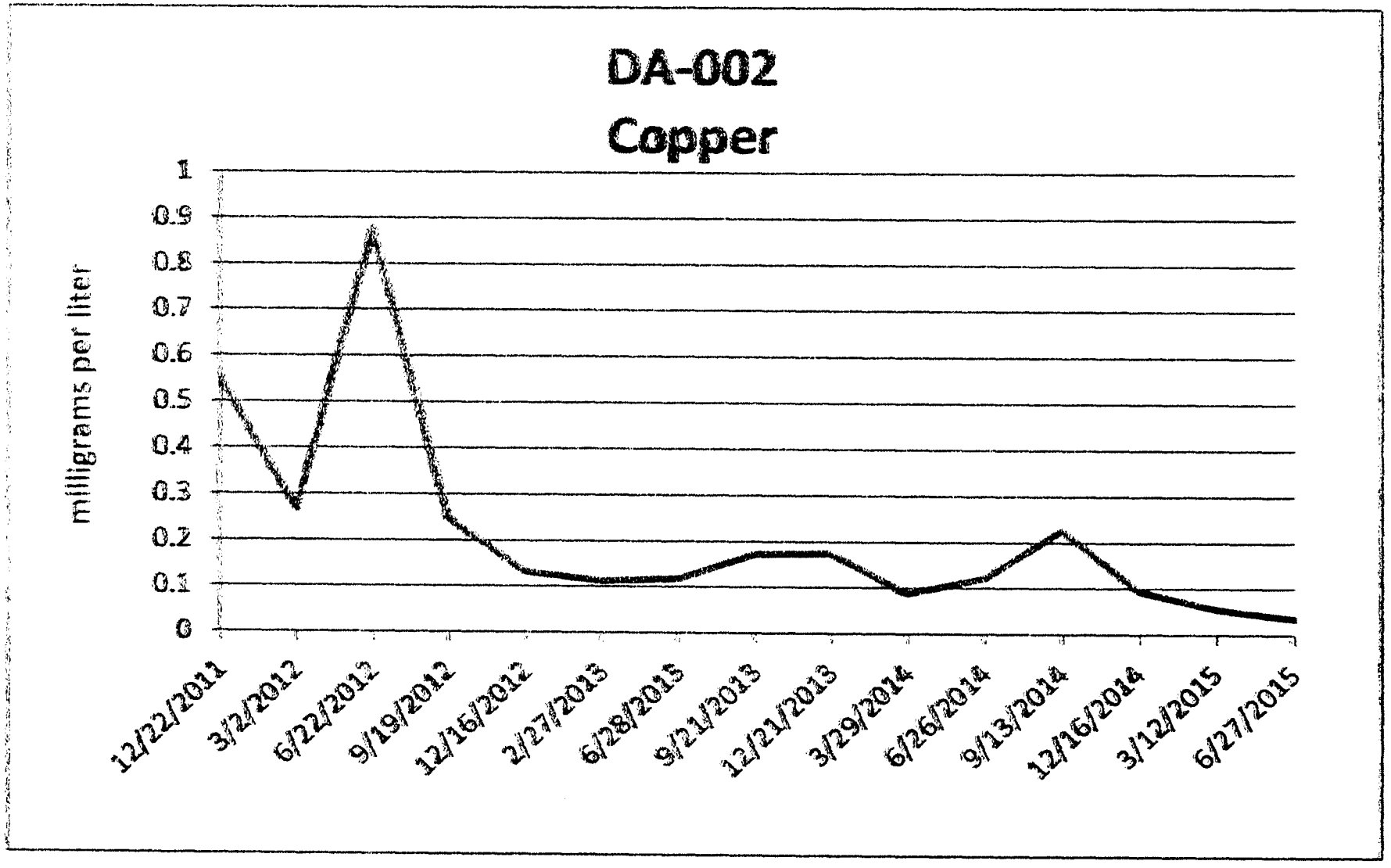

DA-001
Copper
milligrams per liter
1.8
1.6
1.4
1.2
1
0.8
0.6
0.4
0.2
0
12/22/2011
3/2/2012
6/22/2012
9/19/2012
12/16/2012
2/27/2013
6/28/2013
9/21/2013
12/21/2013
3/29/2014
6/26/2014
9/13/2014
12/16/2014
3/12/2015
6/27/2015

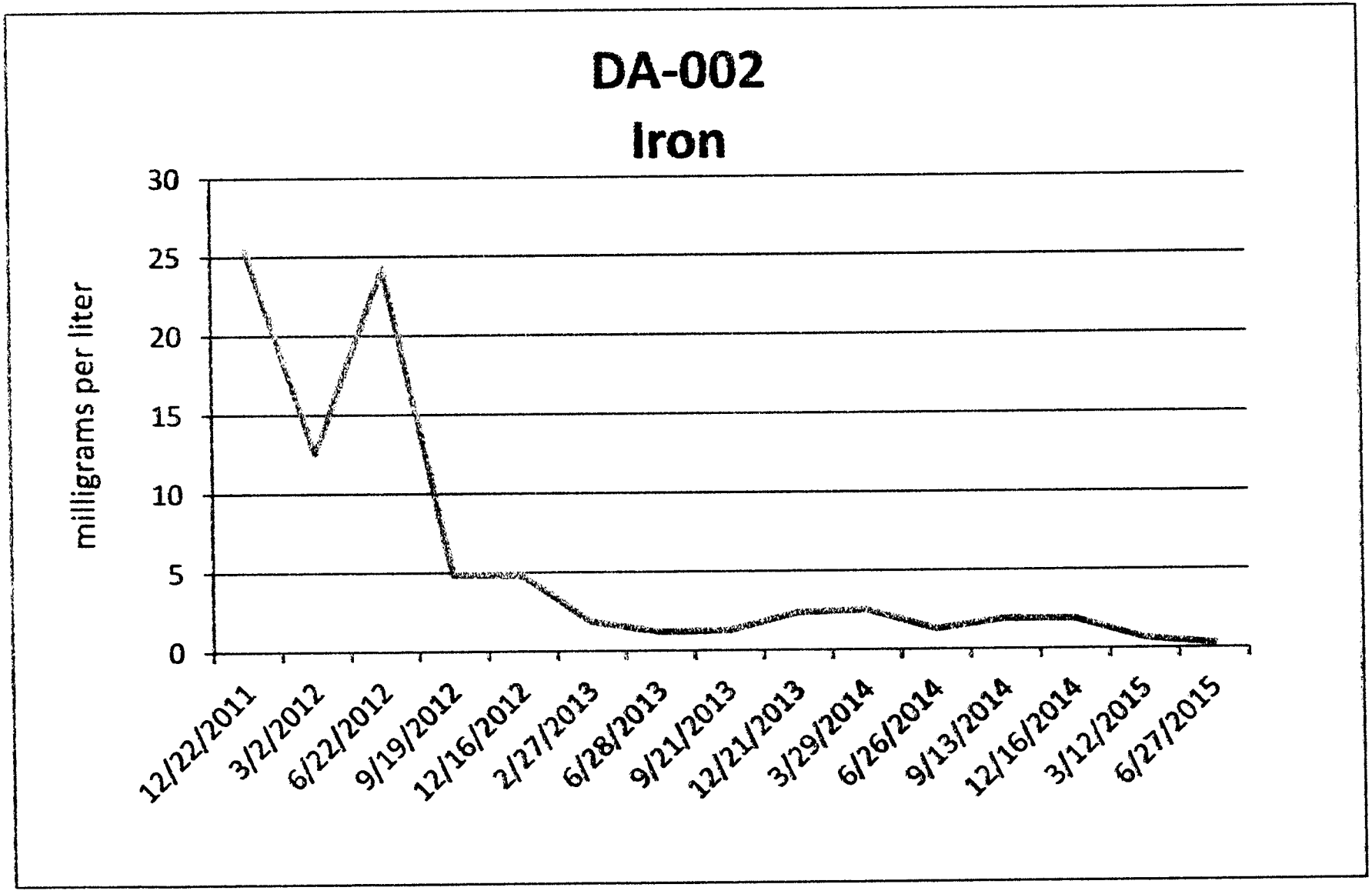

DA-001
Iron
milligrams per liter
40
35
30
25
20
15
10
5
0
12/22/2011
3/2/2012
6/22/2012
9/19/2012
12/16/2012
2/27/2013
6/28/2013
9/21/2013
12/21/2013
3/29/2014
6/26/2014
9/13/2014
12/16/2014
3/12/2015
6/27/2015

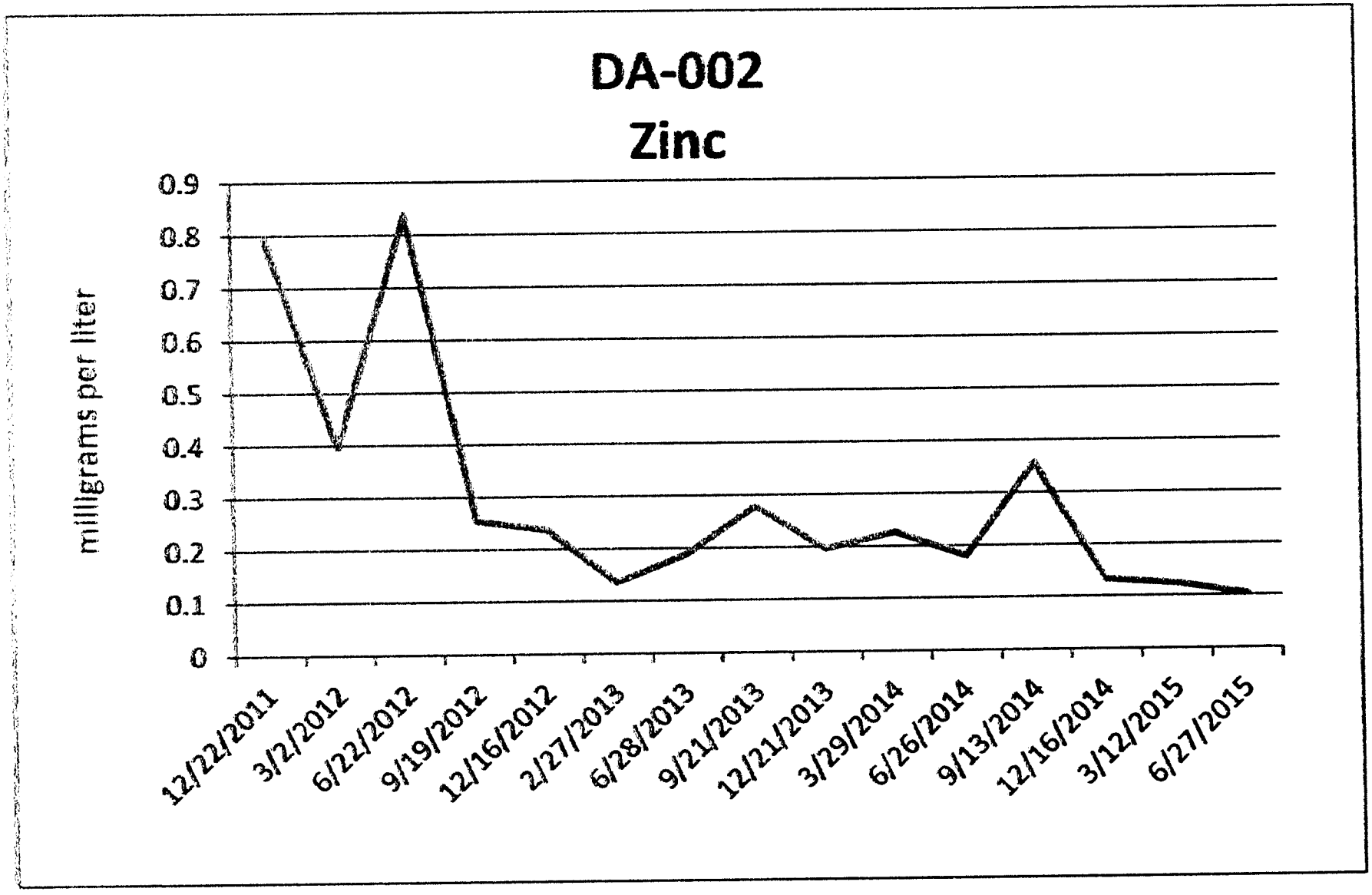

DA-001
Zinc
milligrams per liter
1.8
1.6
1.4
1.2
1
0.8
0.6
0.4
0.2
0
12/22/2011
3/2/2012
6/22/2012
9/19/2012
12/16/2012
2/27/2013
6/28/2013
9/21/2013
12/21/2013
3/29/2014
6/26/2014
9/13/2014
12/16/2014
3/12/2015
6/27/2015


DA-001
Chemical Oxygen Demand
milligrams per liter
900
800
700
600
500
400
300
200
100
0
12/22/2011
3/2/2012
6/22/2012
9/19/2012
12/16/2012
2/27/2013
6/28/2013
9/21/2013
12/21/2013
3/29/2014
6/26/2014
9/13/2014
12/16/2014
3/12/2015
6/27/2015


DA-002
Aluminum
milligrams per liter
18
16
14
12
10
8
6
4
2
0
12/22/2011
3/2/2012
6/22/2012
9/19/2012
12/16/2012
2/27/2013
6/28/2013
9/21/2013
12/21/2013
3/29/2014
6/26/2014
9/13/2014
12/16/2014
3/12/2015
6/27/2015


DA-002
Copper
milligrams per liter
1
0.9
0.8
0.7
0.6
0.5
0.4
0.3
0.2
0.1
0
12/22/2011
3/2/2012
6/22/2012
9/19/2012
12/16/2012
2/27/2013
6/28/2013
9/21/2013
12/21/2013
3/29/2014
6/26/2014
9/13/2014
12/16/2014
3/12/2015
6/27/2015


DA-002
Iron
milligrams per liter
30
25
20
15
10
5
0
12/22/2011
3/2/2012
6/22/2012
9/19/2012
12/16/2012
2/27/2013
6/28/2013
9/21/2013
12/21/2013
3/29/2014
6/26/2014
9/13/2014
12/16/2014
3/12/2015
6/27/2015


DA-002
Zinc
milligrams per liter
0.9
0.8
0.7
0.6
0.5
0.4
0.3
0.2
0.1
0
12/22/2011
3/2/2012
6/22/2012
9/19/2012
12/16/2012
2/27/2013
6/28/2013
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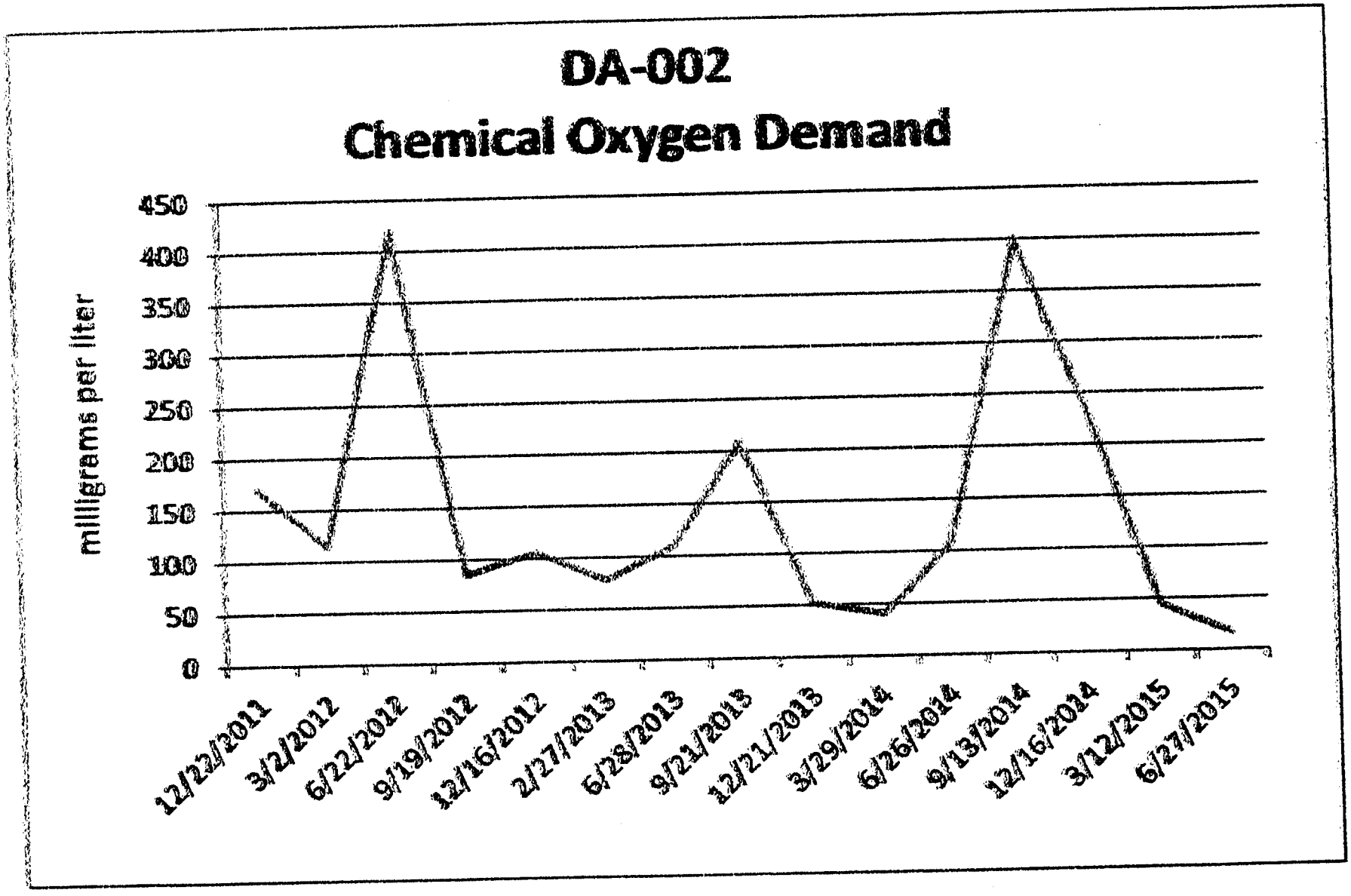
DA-002
Chemical Oxygen Demand
milligrams per liter
450
400
350
300
250
200
150
100
50
0
12/22/2011
3/2/2012
6/22/2012
9/19/2012
12/16/2012
2/27/2013
6/28/2013
9/21/2013
12/21/2013
3/29/2014
6/26/2014
9/13/2014
12/16/2014
3/12/2015
6/27/2015